

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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ALLSTATE INSURANCE COMPANY,) CIVIL ACTION
Plaintiff,) NO: _____
-against-)
DAVID MUN M.D. AND NARA REHAB) COMPLAINT
MEDICAL, P.C.,)
Defendants.) (TRIAL BY JURY DEMANDED)
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Plaintiff, Allstate Insurance Company (interchangeably referred to herein as "Allstate" and "Plaintiff"), by their attorneys Stern & Montana, LLP, for their Complaint against Defendants David Mun, M.D., and Nara Rehab Medical, P.C., (collectively "Defendants"), allege as follows:

PRELIMINARY STATEMENT

1. For over 4 years, beginning on or about October of 2007 through the filing of this Complaint, Defendant David Mun, M.D. ("Mun"), through Nara Rehab Medical, P.C. ("Nara Rehab"), systematically defrauded automobile insurance companies of thousands of dollars per year by fraudulently billing for electrodiagnostic tests, including but not limited to, nerve conduction velocity studies ("NCVs") and needle electromyography ("EMGs") (collectively referred to as "Electrodiagnostic Testing"), that were not performed as billed, were fabricated and/or of no diagnostic value.

2. This action seeks to recover more than \$500,000.00 that Defendants stole from Plaintiff through the submission of hundreds of false and/or fraudulent insurance claims for Electrodiagnostic Testing that was not performed as billed, was fabricated and/or of no diagnostic value.

3. At all relevant times mentioned herein, Mun was listed as the purported owner of Nara Rehab, a professional corporation, which submits bills to, among others, insurers, in general, and Allstate, in particular, for reimbursement of Electrodiagnostic Testing under the New York Comprehensive Motor Vehicle Insurance Reparations Act (popularly known as the "No-fault Law").

4. At all relevant times mentioned herein, the Electrodiagnostic Testing was provided pursuant to a predetermined course of treatment, irrespective of medical necessity.

5. On information and belief, the Electrodiagnostic Testing was purportedly provided to individuals who were reportedly injured in automobile accidents and who were covered under Allstate's automobile insurance policies, which provides for coverage under the No-fault Law. Under that law, policyholders and others who sustain injuries in automobile accidents can obtain payments from the policyholders' automobile insurance companies, like Allstate, for necessary medical care, including treatments, tests and medical equipment ordered by the patients' physicians. Patients can also assign those benefits to doctors and other licensed healthcare providers, such as Nara Rehab, enabling them to bill insurance companies directly for their services. Defendants created and engaged in the scheme to defraud alleged herein to exploit the No-fault system by obtaining such assignments, and billing insurers for fictitious and/or unnecessary medical services that were of no diagnostic value and not performed as billed.

6. On information and belief, the vast majority of Electrodiagnostic Testing was rendered to individuals involved in automobile accidents who complained of soft-tissue injuries.

7. On information and belief, through Nara Rehab, Mun fraudulently submitted hundreds, if not thousands, of bills for Electrodiagnostic Testing that were not performed as billed, were fabricated and/or of no diagnostic value. In that regard, in numerous instances, the reported results associated with the foregoing diagnostic tests were fictitious, meaning that Defendants routinely, intentionally and knowingly submitted fabricated reports, findings and data to Allstate to substantiate the fraudulent claims and induce payment. By way of example and not limitation, annexed hereto as Exhibit "A" is a spreadsheet listing a representative sample of claims Allstate paid to Mun and/or Nara Rehab for reimbursement of Electrodiagnostic Testing that were not performed as billed, fabricated and/or of no diagnostic value. In each instance, Mun knew or should have known that the Electrodiagnostic Testing was bogus, contained material and misleading statements, was not rendered as billed and/or was of no diagnostic value.

8. On information and belief, the primary purpose for which the Electrodiagnostic Testing was purportedly performed was to financially enrich Mun.

9. On information and belief, virtually every aspect of Defendants' fraudulent scheme was motivated by money and greed, and without regard to the grave harm inflicted on the public at large by holding themselves out as providing legitimate medical services when in fact they were providing, if anything, unnecessary and invalid services that exposed their patients to invasive procedures and further potential harm by other healthcare professionals who might rely on their intentionally false findings and diagnoses concerning the Electrodiagnostic Testing.

10. On information and belief, in furtherance of the scheme to defraud, Mun, through Nara Rehab, intentionally and knowingly submitted or caused to be submitted countless

fraudulent bills for Electrodiagnostic Testing relating to services that were performed in such a way that they were of no diagnostic value and not performed as billed to Allstate.

11. The practices alleged herein were conducted willfully, with the sole object of converting money, in utter disregard of their impact on the premium-paying public and in flagrant disregard of the rules and laws governing provision of services under the No-fault Law.

12. The fraudulent billing activity described herein not only is an imminent and ongoing threat to consumers' health, but it drains the limited health care resources of this Country, resources which are already under strain to meet legitimate healthcare needs. The New York State Insurance Department and insurance committees in both the New York State Senate and Assembly each estimate that No-fault insurance fraud is costing New York State consumers in excess of one billion dollars a year.

13. The duration, scope and nature of the Defendants' illegal conduct brings this case well within the realm of criminal conduct to which the Racketeering Influenced and Corrupt Organization Act ("RICO") applies. Defendants did not engage in sporadic acts of fraud -- although that would be troubling enough -- they adopted a fraudulent blueprint as their business plan, and used it to participate in a systematic pattern of racketeering activity. Every facet of Defendants' operation, from generating fraudulent supporting medical documents to record keeping to billing, was carried out for the purpose of committing fraud.

NATURE OF THE ACTION

14. This action is brought pursuant to:

- i. The United States Racketeer Influenced and Corrupt Organizations Act ("RICO"); 18 U.S.C. § 1962(c); and
- ii. New York State Common Law.

NATURE OF RELIEF SOUGHT

15. Allstate seeks treble damages (pursuant to 18 U.S.C. § 1341) that it sustained as a result of the Defendants' schemes and artifices to defraud, and acts of mail fraud, in connection with their use of the facilities of the No-fault system and its assignment of benefits mechanism to fraudulently obtain payments from Allstate for medical services they allegedly rendered to individuals covered by Allstate under New York State's No-fault Law.

16. Allstate seeks compensatory and punitive damages under the Common Law.

17. Allstate further seeks recovery of the No-fault claim payments made under the independent theory of unjust enrichment.

18. As a result of Defendants' actions alleged herein, Allstate was defrauded of an amount in excess of \$500,000.00, the exact amount to be determined at trial, in payments which Defendants received for fraudulently billing Allstate for services that they knew or should have known were of no diagnostic value and/or fabricated and not performed as reflected in the bills submitted to Allstate.

THE PARTIES

A. Plaintiff

19. Plaintiff Allstate Insurance Company is duly organized and existing under the laws of the State of Illinois; licensed to engage in the writing of automobile insurance policies in the State of New York; and provides automobile insurance coverage to its policyholders under and in accordance with New York State Law.

B. Defendant David Mun, M.D.

20. Defendant David Mun, M.D., is a natural person residing in the State of New York, licensed to practice medicine in the State of New York under license number 234121 issued by the New York State Education Department on or about October 1, 2004 and is the principal, officer and/or director of Nara Rehab and, at all relevant times mentioned herein, controlled every aspect of its activities.

21. On information and belief, in furtherance of the scheme to defraud and as a matter of practice, procedure and protocol, Mun purportedly performed Electrodiagnostic Testing at and through Nara Rehab that he knew or should have known would produce medically invalid test results of no diagnostic value and, therefore, any bills for such services submitted to Allstate for reimbursement based thereon were fraudulent.

22. On information and belief, Mun, through Nara Rehab, billed and received payments from Allstate for Electrodiagnostic Tests which were never rendered as billed and/or were fabricated and/or of no diagnostic value.

23. On information and belief, Mun, through Nara Rehab, submitted billing and supporting documentation to induce payment for services that were not performed as billed and/or were fabricated and/or of no diagnostic value. A representative sample of claims in which Mun knowingly submitted bills to Allstate for Electrodiagnostic Testing that was not performed as billed and/or was fabricated and/or of no diagnostic value is annexed hereto as Exhibit "A."

24. On information and belief, in furtherance of the scheme to defraud and as a matter of practice, procedure and protocol, Mun, through Nara Rehab, billed and received payment from insurers, in general, and Allstate, in particular, for Electrodiagnostic Testing that

he knew or should have known contained medically invalid test results and/or were of no diagnostic value and/or were materially misrepresented and were fraudulent.

C. Defendant Nara Rehab Medical, PC.

25. Nara Rehab was incorporated on or about October 19, 2007 and is a professional corporation authorized to do business in the State of New York, with its principal place of business located at 150-01 Northern Blvd. Flushing, NY 11354. On information and belief, from the date of its incorporation through the filing of this Complaint, David Mun was listed on corporate paperwork filed with the State as the purported owner of Nara Rehab.

26. On information and belief, in furtherance of the scheme to defraud and as a matter of practice, procedure and protocol, Nara Rehab billed and received payment from insurers, in general, and Allstate, in particular, for Electrodiagnostic Testing that it knew or should have known contained medically invalid test results, were of no diagnostic value and were fraudulent.

JURISDICTION AND VENUE

27. The jurisdiction of the Court arises under the Racketeer Influenced and Corrupt Organizations Act (“RICO”), 18 U.S.C. § 1961, et seq.; 28 U.S.C. §§ 1331; and principles of pendent jurisdiction.

28. The Court has supplemental jurisdiction over the claims arising under state law pursuant to 28 U.S.C. § 1337(a).

29. Venue lies in this District Court under the provisions of 28 U.S.C. § 1391, as the Eastern District of New York is the District where one or more the Defendants reside and because this is the District where a substantial amount of the activities forming the basis of the Complaint occurred.

FACTUAL BACKGROUND

30. Allstate underwrites automobile insurance in New York State and participates as an insurer in New York State's No-fault program.

31. Under the Comprehensive Motor Vehicle Insurance Reparations Act of New York State, Ins. Law §§ 5101, et seq., Allstate is required to pay, *inter alia*, for health service expenses that are incurred as a result of injuries suffered by occupants of their insured motor vehicles and pedestrians ("Covered Persons") that arise from the use or operation of such motor vehicles in the State of New York.

32. On information and belief, the Defendants are referred patients for Electrodiagnostic Testing by various medical clinics throughout downstate New York.

33. On information and belief, Nara Rehab billed for Electrodiagnostic Testing to, among others, individuals covered under the No-fault Law. In exchange for its services, Nara Rehab accepted assignments of benefits from their patients covered under the No-fault Law ("No-fault claimants" or "claimants") and submitted claims for payment to No-fault insurance carriers, in general, and to Allstate, in particular.

34. In purported compliance with the No-fault Law and 11 NYCRR 65 et seq., Nara Rehab submitted proof of their claims to Allstate, using a Health Insurance Claim Form 1500 (known as a "HCFA 1500 form") or a substantially similar form.

35. Pursuant to Section 403 of the New York State Insurance Law, the claim forms submitted to Allstate by Nara Rehab contained the following (or substantially similar) warning on the back of the claim form:

Any person who knowingly and with intent to defraud any insurance company or other person files an application for insurance or statement of claim containing any materially false information, or conceals for the

purpose of misleading, information concerning any fact material thereto, commits a fraudulent insurance act, which is a crime

36. To process and verify claims submitted by Nara Rehab, Allstate required, and Nara Rehab submitted, narrative reports and other medical records relative to its entitlement to recover No-fault benefits, as well as to the alleged medical care and treatment rendered to patients, for which it was seeking payment from Allstate.

37. Pursuant to the No-fault Law and implementing regulations, as well as the applicable policies of insurance, Allstate is required to promptly process claims within 30 days of receipt of the proof of claim.

38. To fulfill its obligation to promptly process claims, Allstate justifiably relied upon the bills and documentation submitted by Defendants in support of their claims, and paid Defendants based on the representations and information that Defendants submitted to Allstate.

39. On information and belief, Nara Rehab was created as the centerpiece of a scheme to fraudulently bill No-fault insurance carriers for Electrodiagnostic Testing that was never provided as billed, was fabricated and/or of no diagnostic value.

40. On information and belief, to the extent any Electrodiagnostic Testing was performed, it was performed in such a manner that Mun knew or should have known would produce invalid data and findings that were of no diagnostic value.

41. On information and belief, to maximize profits, Mun, through Nara Rehab, billed for Electrodiagnostic Testing on Covered Persons in which such testing was performed incorrectly and contained false data and material misrepresentations that were misleading and of no diagnostic value.

42. On information and belief, Mun ordered and performed and/or caused to be performed, for his economic benefit, Electrodiagnostic Testing for Covered Persons and signed his name on Electrodiagnostic Testing records, reports and bills that contained false and fabricated data and representations that such tests were performed when, in fact, they were fabricated, and/or not performed as billed and/or of no diagnostic value.

43. On information and belief, Mun ordered and performed and/or caused to be performed for his economic benefit Electrodiagnostic Testing for Covered Persons, signed his name to medical records, reports and bills where he falsely represented that the services were actually performed, when in fact in many instances they were misrepresented, fabricated and/or not performed as billed.

44. On information and belief, Mun ordered and performed and/or caused to be performed for his economic benefit Electrodiagnostic Testing for Covered Persons, signed his name to fraudulent medical records, reports and bills where he falsely represented that the services yielded medically valid diagnoses when, in fact, they were of no diagnostic value in that the diagnoses were invalid and materially misrepresented and were submitted to Allstate in furtherance of the scheme to defraud alleged herein.

45. On information and belief, Nara Rehab was a well organized illegal enterprise, created and controlled by Mun, which engaged in systematic and pervasive fraudulent practices that distinguished it from legitimate healthcare providers. On information and belief, the components of that enterprise followed practices that were part of a racketeering scheme dictated by Mun:

- Unlike legitimate medical practices, Defendants misrepresented the existence or severity of any injuries that the patient may have had and the course of any treatments.

- Unlike legitimate medical practices, Defendants routinely submitted claims for Electrodiagnostic testing that did not occur and/or was performed in a sub-standard manner from which no useful medical information could be derived, and submitted false medical reports in support of those services.
- Unlike legitimate medical practices, Defendants established a fraudulent protocol for the Electrodiagnostic Testing of “patients.”
- Unlike legitimate medical practices, Defendants routinely failed to interpret the findings according to the standard of care and misrepresented test results for Electrodiagnostic Testing.
- Unlike legitimate medical practices, Defendants routinely fabricated and submitted fraudulent documentation to insurers for payment, including but not limited to duplicate tests results for NCVs purportedly provided to multiple patients when, in fact, documentation for such services were fraudulently fabricated and/or contained material misrepresentations and/or reflected billing for services that were never rendered as billed.
- Unlike legitimate medical practices, rather than perform a valid test according to prevailing standards of medical care as they must, Mun, through Nara Rehab, performed invalid and bogus Electrodiagnostic tests that willfully misrepresented medical facts and potentially endangered the patients.
- Unlike legitimate medical practices, Defendants submitted bills wherein they knowingly, with the intent to deceive Allstate and induce payment as a result thereof, falsely misrepresented the services reflected therein, when in fact the services were not performed as billed and/or were of no diagnostic value.

46. In these and numerous other ways, Defendants sought to deceive Allstate into paying fraudulent claims that typically exceeded thousands of dollars per Covered Person.

47. On information and belief, Mun was responsible for the daily operation and management of Nara Rehab and directed the affairs of the enterprise. By way of example and not limitation, in furtherance of the scheme to defraud, Mun:

- Prepared or caused to be prepared fraudulent medical reports documenting test results and diagnoses that he knew contained materially false and misleading information;
- Prepared or caused to be prepared fraudulent bills and sent them to Allstate; and

- Prepared, or caused those acting under his direction, to prepare and mail bogus claims, knowing that they contained materially false and misleading information;

48. At all relevant time mentioned herein, Mun knew or should have known that the Electrodiagnostic Testing for which Nara Rehab billed Allstate was not performed as billed, was fabricated and/or of no diagnostic value.

49. At all relevant times mentioned herein, Mun, through Nara Rehab, directly or through others acting under and pursuant to his directions, instructions and control, submitted or caused to be submitted fraudulent bills for Electrodiagnostic Testing, in furtherance of the scheme to defraud alleged herein, to obtain payment in connection with fraudulent claims.

50. As a result of the Defendants' fraudulent billing scheme, Allstate has paid Defendants in excess of \$500,000.00 in fraudulent and unnecessary medical services.

THE MECHANICS OF THE SCHEME TO DEFRAUD

51. In furtherance of the scheme to defraud, individuals who were purportedly involved in automobile accidents in which they purportedly sustained soft-tissue injuries would present to a medical clinic operating in the New York metropolitan area that bill No-fault insurers for medical services (hereinafter "No-fault Clinics"), which would result in the claimants being referred to Nara Rehab for Electrodiagnostic Testing, performed and billed by Mun, through Nara Rehab.

52. On information and belief, in furtherance of the scheme to defraud, a Covered Person's initial office consultation at Nara Rehab automatically triggered a protocol designed to fraudulently bill insurance companies, in general, and Allstate, in particular, for

Electrodiagnostic Testing that was never performed as billed and/or was fabricated and/or of no diagnostic value.

53. In furtherance of the scheme to defraud, in numerous instances, Defendants billed for Electrodiagnostic Testing regardless of whether such treatments and studies were actually performed in a medically valid manner and/or of diagnostic value.

54. Materially misrepresenting Electrodiagnostic Testing was part of Defendants' scheme to maximize profits through the provision and billing for fraudulent services.

THE ELECTRODIAGNOSTIC SCHEME TO DEFRAUD

A. Electrodiagnostic Fraud in General

55. On information and belief, virtually all of the claims in which Nara Rehab submitted bills, and were paid by Allstate, involved patients who were involved in automobile accidents in which they suffered only soft-tissue injuries.

56. The nervous system is divided into two major anatomical divisions: the central nervous system and the peripheral nervous system. The central nervous system includes the brain and the spinal cord, while the peripheral nervous system includes the peripheral nerves. The purpose of the neurological examination is to identify the presence of any abnormality in the nervous system. The standard neurological examination checks the function and integrity of each component of the nervous system, including examination for the presence of generalized diseases of the peripheral nerves, known as neuropathy. Neuropathy can result from many diseases such as diabetes, kidney failure, cancer, AIDS and from systemic inflammatory disease of the small arteries of the body. In accordance with accepted medical practice, when a physician conducts an examination of a patient where the complained of symptoms may affect

the nervous system or where the examination shows findings suggestive of nervous system disease or injury, it is essential that the physician rule out the existence of neuropathy. The presence or absence of neuropathy is determined by performing and properly interpreting NCV testing.

57. On information and belief, virtually all of the medical documentation submitted by Defendants to Allstate relating to Electrodiagnostic Testing was based on reports that fraudulently documented and/or materially misrepresented the results.

58. On information and belief, Mun through Nara Rehab and for his own personal pecuniary benefit, as a matter of practice, procedure and protocol, fraudulently billed for Electrodiagnostic Testing that intentionally misrepresented the services purportedly rendered which in fact were never performed as billed and/or were otherwise fabricated and/or of no diagnostic value.

59. In numerous instances, the reported results associated with the Electrodiagnostic Testing were fictitious, meaning that Defendants routinely and as an integral element of their scheme to defraud, submitted fabricated reports, findings and data to insurance companies, in general, and Allstate, in particular, to substantiate their fraudulent claims and induce payment.

60. Radiculopathy is defined as injury or dysfunction of spinal nerve roots, which may affect the nerve root of a sensory nerve, motor nerve or both. With respect to trauma cases, such as those suffered as a result of automobile accidents, for the few cases in which radiculopathy occurs, the usual cause of radiculopathy is direct pressure on the nerve root by a herniated intervertebral disc causing inflammation of the nerve root.

61. The presence or absence of radiculopathy is determined by performing an EMG. It is impossible to correctly interpret an EMG unless the NCV is properly performed and interpreted in accordance with the prevailing standard of practice.

62. The AMA is the publisher of the CPT Code Book, which is the definitive medical source used by licensed medical professionals to accurately describe, among other things, medical and diagnostic services performed and billed to third-party payors, such as insurance companies.

63. Pursuant to Section 5108 of the Insurance Law, the Department of Insurance has adopted the Fee Schedule published by the Workers' Compensation Board, which sets forth the charges for professional health services that are reimbursable under the No-fault Law. The Fee Schedule incorporates the CPT codes published by the AMA, and the coding rules and regulations set forth by the AMA.

64. At all relevant times mentioned herein, Defendants submitted bills to Allstate using CPT codes that intentionally and materially misrepresented the services, if any, performed and for which they sought reimbursement and were paid.

65. In furtherance of the scheme to defraud alleged herein, as a matter of practice, procedure and protocol, Defendants billed Allstate for EMGs when in fact such services were not performed as billed and/or the tests results relating thereto were fabricated and/or of no diagnostic value.

66. On information and belief, Nara Rehab routinely submitted bills for reimbursement to Allstate for expensive NCV testing that reflected services that were materially misrepresented, fabricated and/or never performed as billed and/or performed in a way that could not possibly produce valid data or results.

67. In a review of 47 representative claim files where Nara Rehab submitted to Allstate medical records in support of claims for reimbursement for electrodiagnostic studies, 85 of the studies (91%) reflected billing for excessive NCVs. A table identifying the representative NCVs that were overutilized is annexed hereto as Exhibit "B."

68. On information and belief, the Defendant PCs, as a matter of procedure, practice, and protocol, routinely submitted to Allstate medical records, reports and bills for reimbursement of Electrodiagnostic Testing that was purportedly performed to diagnose radiculopathy, but were instead false and used merely to fraudulently justify the administering of the expensive Electrodiagnostic Testing and to intentionally overstate and misrepresent the extent of injury to justify further expensive treatment.

69. On information and belief, Defendants devised a scheme whereby they frequently documented objective examination findings of radiculopathy when, in fact, statistically the documented frequency and distribution of clinical neurological findings could not exist and, therefore, were fraudulently reported. The fraudulently documented clinical findings were subsequently used to justify the performance of expensive Electrodiagnostic Testing.

70. On information and belief, in numerous instances, the clinical documentation produced by Defendants relating to the Electrodiagnostic Testing was the product of a sophisticated scheme to produce large volumes of clinical documentation that were totally divorced from and intended to misrepresent the true clinical status of the "patient" documented by Mun who purportedly treated the claimants.

B. NCV Fraud

71. On information and belief, the Defendants routinely submitted bills for reimbursement to Allstate for expensive NCV tests that reflected services (to the extent any were performed) that were materially misrepresented, fabricated and/or never performed or performed in a way that could not possibly produce valid data or results.

72. On information and belief, to confirm or rule out a diagnosis through an NCV and EMG, the data and results produced from the NCV must be performed and interpreted in a medically valid manner according to the standard of practice. Notwithstanding the foregoing, Defendants as a matter of procedure, practice, and protocol, routinely billed Allstate for NCV and EMG testing allegedly performed to evaluate neurological symptoms, even though the NCV and EMG tests were performed and interpreted in an invalid manner that violated the standard of care and lacked medical efficacy. The billing for such services constitutes and represents fraudulent billing for services that were never performed, fabricated and/or misrepresented.

1. Over utilization of NCVs

73. On information and belief, as a matter of procedure, practice and protocol, the Defendants over-utilized NCV studies to fraudulently bill Allstate for services that were excessive and performed, if at all, solely to maximize reimbursement to Defendants.

74. In a review of sample NCV studies (not including H and F-wave studies) submitted by Nara Rehab to Allstate in support of claims for reimbursement for performing such tests, the NCV studies were excessive and overutilized. A table identifying 85 studies reflecting excessive and over utilized NCVs submitted by Nara Rehab to Allstate is annexed hereto as Exhibit "B."

75. Assuming that Mun actually performed the billed for studies, the over utilization of such studies served no purpose other than to enrich him through higher reimbursement, while needlessly exposing his “patients” to increased pain associated with the electrical stimulations required by the testing.

76. To increase and maximize reimbursement from insurers, in general, and Allstate, in particular, as a matter of practice, procedure and protocol, Defendants intentionally over-utilized NCVs to fraudulently bill Allstate for unnecessary services.

77. On information and belief, because NCV testing is reimbursed for each nerve tested, Defendants intentionally overutilized NCV testing and fraudulently misrepresented that the NCV testing purportedly rendered was performed, when in fact, it was not.

78. Despite the official position of the AMA and the standard of practice that five (5) is the maximum number of NCVs necessary for the examination of 90% of all radiculopathy cases, Nara Rehab, as a matter of practice, procedure and protocol, billed and/or conspired to bill Allstate for 26 NCVs per Covered Person (16 motor and sensory nerve studies, 8 F waves and 2 H reflex tests). A table identifying 85 sample NCV studies for which Nara Rehab submitted bills for 26 NCV studies is annexed hereto as Exhibit “B.”

2. Failure to Report Conduction Block

79. On information and belief, as a matter of pattern, practice, and protocol, Nara Rehab routinely submitted to Allstate NCV test results in support of claims for reimbursement which demonstrated a significant drop in proximally evoked responses as compared to distal responses. In each such instance, the data of such reports is indicative that the test results were: (1) intentionally misrepresented; (2) the product of incorrectly performed NCV studies that Mun knew or should have known required correction, but failed to do so in real time

because he was not performing the services for which he was billing under the Electrodiagnostic CPT codes; or (3) indicative of “conduction block,” which is an electrodiagnostic finding indicative of a serious medical problem that Mun failed to further evaluate because he knew the electrodiagnostic findings were fictitious and there was nothing actually wrong with the Covered Persons to whom the tests were purportedly administered.

80. By way of example and not limitation, a review of sample NCV studies submitted by Nara Rehab to Allstate in support of claims for reimbursement reflects a significant (at least 50%) drop in the proximally evoked response as compared to the distal response on nerve conduction studies, indicative of a conduction block. A table identifying 59 NCV studies, submitted by Nara Rehab to Allstate in support of claims for reimbursement, in which a conduction block was present but failed to be noted, is annexed hereto as Exhibit “C.”

81. According to the AMA, conduction block is an important pathologic finding. The AMA’s CPT Advisor (April 2002 Volume 12, Issue 4), states that NCV studies are performed to assess the integrity of and diagnose diseases of the peripheral nervous system and an NCV Report should document the nerves evaluated, the distance between the stimulation and recording sites, conduction velocity, latency values, and amplitude, and include a final diagnosis. Notwithstanding its potential seriousness, Mun’s reports failed to report that a conduction block was present in the studies in which it occurred, nor was conduction block taken into account in the final diagnosis, nor was there a mention of an appropriate diagnostic examination in Mun’s recommendations.

82. On information and belief, by failing to indicate that a conduction block was present in the studies in which it occurred, Mun’s reports failed to meet the basic criteria for

the use of this CPT code, thereby such services were not rendered as billed and in accordance with the applicable CPT code.

83. On information and belief, as a matter of practice, procedure and protocol, Defendants fraudulently submitted NCV studies to Allstate in which the data values relating to latency, amplitude and other parameters of the evoked responses were, in part or wholly, fictitious, contrived and invalid, meaning that Defendants routinely submitted to Allstate test results and data containing material misrepresentations to substantiate their fraudulent claims and induce payment.

84. In numerous instances, the NCV studies submitted by Defendants were routinely interpreted by Mun to be within normal limits, when in fact, the data submitted by Defendants, upon which these interpretations were purportedly based, contained data values and abnormal electrodiagnostic findings that if taken at face value are suggestive or diagnostic of an underlying neuropathy that were entirely ignored. By ignoring these obvious abnormalities, Mun failed to provide the fundamental professional medical services for which Nara Rehab fraudulently submitted and/or conspired to submit bills to Allstate for reimbursement under the No-fault Law.

85. On information and belief, were the reported abnormal data values submitted by Defendants to Allstate true and the cause of the apparent neuropathy not diagnosed and treated, the “patient” would be placed at risk for progressive neurological disorders and/or underlying disease.

86. On information and belief, if the reported findings were in fact true, these abnormal electrodiagnostic results required emergent diagnostic work-ups to identify the cause of said neuropathy or other nerve injury. In each instance, the Covered Person did not receive

the required follow-up or diagnostic testing consistent with the abnormal findings. Rather, the abnormal findings were often reported as being within “normal” limits or were otherwise ignored.

87. On information and belief, the results of the Electrodiagnostic Testing were ignored because they were known to be fictitious and therefore not indicative of any underlying condition warranting additional examination or diagnostic testing of the Covered Person.

88. On information and belief, if the abnormal test results and data values reported by Mun were true and went untreated, the “patients” would have been left to suffer from various neuropathies, including potentially grave neuropathies and undiagnosed systemic diseases, such as Guillaume-Barre syndrome (GBS), chronic inflammatory demyelinating polyneuropathy (CIDP) and multifocal motor neuropathy with persistent conduction block (MMN).

89. On information and belief, Mun did not either rule out conduction blocks or diagnose the potentially serious conditions that cause conduction blocks in the aforementioned studies because he knew that the studies were bogus, fictitious, and therefore not indicative of any underlying condition warranting additional examination or diagnostic testing of the Covered Person.

3. Impossible Distribution of Amplitude Values

90. On information and belief, in furtherance of Defendants’ scheme to defraud, in numerous instances, Nara Rehab submitted to Allstate NCV test results in support of claims for reimbursement in which proximal stimulation reportedly yielded significantly higher amplitude than distal stimulation of the nerve. In each such instance, the data of such reports is

indicative that: (1) the NCV testing was fabricated and/or the tests were performed in a manner contrary to accepted medical practice and contrary to the AMA rules that govern the use of CPT codes; and/or that the test results were (2) intentionally misrepresented; or (3) the product of incorrectly performed NCV studies that Mun knew or should have known required verification and immediate re-testing in order to obtain valid data rather than medically impossible findings.

91. On information and belief, since the reported NCV findings cannot actually exist in nature, Mun should have repeated the study to obtain valid data. The only reasonable explanation for Mun's failure to correct the testing is that he was not supervising the technician in real time and reviewing the results before the "patient" left the room as required, and he believed that such real time supervision was unnecessary since he knew there was nothing wrong with the Covered Persons to whom the tests were purportedly administered.

92. By way of example and not limitation, in 13 of 93 (14%) electrodiagnostic studies submitted by Nara Rehab to Allstate in support of claims for reimbursement, there were instances in which a nerve conduction study showed significantly higher amplitude (at least 25%) on proximal stimulation than on distal stimulation. A table identifying the 13 sample NCV studies which contain impossible amplitude findings is annexed hereto as Exhibit "D."

4. Protocol Approach to NCVs

93. As a matter of practice, protocol and procedure, Mun used what is known as the "protocol approach" to perform NCVs, when in fact accepted medical practice and the AMA, requires that such tests be performed using what is known as a "dynamic" examination or approach as a prerequisite for billing under EMG and NCV CPT codes. Unlike the protocol approach utilized by Mun that resulted in the same set of nerves purportedly being tested (10 nerves for the upper limbs and 8 for the lower limbs) regardless of the patients' symptoms and

findings, the dynamic approach (also known as a “progressive” examination) actually takes into account the individual symptoms and the results and findings of each nerve and muscle tested resulting in a logical, coherent and constantly evolving electrodiagnostic examination, evidenced by variation of the nerves tested on a case-by-case basis.

94. On information and belief, even though the NCV must be performed dynamically, Mun used the protocol approach, which fails to recognize that the nerves and muscles studied will change from case to case, and evolve within a case as the study proceeds.

95. On information and belief, use of the dynamic approach is a prerequisite for the use of the electrodiagnostic CPT codes and, in using the protocol approach as a matter of practice, procedure and protocol, Defendants submitted bills to Allstate for reimbursement of NCVs wherein they represented the services were validly performed and reimbursable under the No-fault Law, when in fact they were not.

96. Even though Mun’s utilization of a protocol approach to the selection of NCVs was violative of the requirements of the applicable CPT codes, Mun, through Nara Rehab, sought reimbursement, and was paid by Allstate, for such services that he knew or should have known were not validly performed, were of no diagnostic value and not reimbursable under the No-fault Law.

97. In a sample of studies where Nara Rehab submitted medical records to Allstate in support of claims for reimbursement for electrodiagnostic tests, Nara Rehab sought reimbursement for the performance of testing on a standard protocol of nerves on each patient, regardless of the patient’s symptoms or findings. A table identifying 93 sample electrodiagnostic studies where the “protocol approach” was used by Nara Rehab is annexed hereto as Exhibit “E.”

98. On information and belief, the use of the “protocol approach,” which, if administered at all, was uniformly employed by Mun, increases the likelihood of invalid diagnoses and unreasonable and unnecessary testing.

99. On information and belief, the use of the “protocol approach,” was uniformly employed by Nara Rehab, virtually assuring the likelihood of medically unreasonable and unnecessary Electrodiagnostic Testing, assuming the purported testing was administered at all.

100. Mun’s purported use of the “protocol approach” (as opposed to utilizing the “progressive” or “dynamic” examination approach) in performing NCVs is contrary to the well accepted practices of the medical community.

101. Mun’s use of the “protocol approach” is contrary to the requirements for billing for electrodiagnostic services under the CPT codes used by Nara Rehab in seeking reimbursement from Allstate, and reflects a pattern and practice of billing for services that were never rendered as billed, were fabricated and/or materially misrepresented and of no diagnostic value.

102. On information and belief, since the NCV testing was substantially or wholly fabricated and/or routinely performed in a manner that could not possibly produce medically valid results, none of the medically accepted electrodiagnostic procedures were followed, rendering the purported services billed by Mun, through Nara Rehab, to Allstate of no diagnostic value and fraudulent.

103. By submitting to Allstate fictitious bills and documentation for NCV testing, Defendants misrepresented the services purportedly rendered, and billed for services

which were not rendered or services performed in an invalid manner, rendering the results of no diagnostic value.

104. By manufacturing phony tests and supporting documentation and/or performing medically invalid testing, Defendants willfully and materially misrepresented their findings and conclusions as valid when in fact they were not.

5. Over utilization of F-Waves

105. In furtherance of Defendants' scheme to defraud, as a matter of procedure, practice, and protocol, Defendants billed Allstate for four (4) F-wave studies on every electrodiagnostic study for which they submitted bills for reimbursement. In a review of 93 sample studies in which F-waves were utilized, Mun over-utilized F-waves in 91 (or 98%) of those studies.

106. On information and belief, the over-utilization of F-waves by Mun was intentionally designed to fraudulently increase reimbursement from Allstate through Defendants' purported routine performance of unnecessary testing. A table identifying 91 sample studies, submitted by Nara Rehab to Allstate for reimbursement, in which F-waves were over-utilized, is annexed hereto as Exhibit "F."

107. On information and belief, the performance of four (4) F-waves in all studies on patients who have been involved in automobile accidents, or even on patients with suspected radiculopathy, is contrary to accepted medical practices, which dictates the use of an EMG to diagnose radiculopathy as opposed to the F-waves that were purportedly performed by Mun.

6. Improper use of F-Waves

108. On information and belief, in addition to the intentional and fraudulent over utilization of F-waves, in numerous instances, Mun did not even correctly administer the test in that he failed to obtain the minimum of ten (10) F-wave responses required by the AMA to obtain an accurate F-wave latency. Failure to do so renders the F-wave results invalid and unusable for clinical purposes. In that regard, Mun, through Nara Rehab, routinely, intentionally and fraudulently billed Allstate for F-waves that were not medically necessary to diagnose radiculopathy, the ostensible justification for the test in the first place, and then, in performing this wholly unnecessary test, failed to stimulate a sufficient number of motor axons to conduct a valid test.

109. By way of example and not limitation, in a review of sample studies that included waveform graphics submitted by Nara Rehab to Allstate for reimbursement, the studies fail to reflect the performance of at least 10 F-wave stimulations, which is required by the CPT codes, and which is the prevailing standard in the field of Electrodiagnostic Testing in order to arrive at a reasonably accurate F-wave latency. A table identifying 81 studies in which Nara Rehab failed to conduct sufficient stimulations to bill for the service is annexed hereto as Exhibit "G."

7. Medically Unnecessary H-Reflex Tests

110. On information and belief, as part of their fraudulent protocol, Defendants routinely submitted medical reports reflecting the performance of H-Reflex testing in every lower limb electrodiagnostic study which was of no diagnostic value and intentionally designed to fraudulently increase reimbursement from Allstate. A table identifying 46 sample studies

submitted by Nara Rehab to Allstate for reimbursement, in which H-Reflex testing was performed in every lower limb electrodiagnostic study, is annexed hereto as Exhibit "H."

111. The systematic and intentional billing for unnecessary H-Reflex testing by Nara Rehab was, and is, contrary to widely accepted medical practices and intentionally designed to fraudulently maximize reimbursement from Allstate.

8. Abnormal NCV Parameters

112. On information and belief, in numerous instances, the NCV studies submitted by Defendants to Allstate in support of claims for reimbursement were routinely interpreted by Mun to be within normal limits, when in fact, the data submitted by Defendants, upon which these interpretations were purportedly based, contained data values and abnormal electrodiagnostic findings that if taken at face value are suggestive or diagnostic of an underlying neuropathy that were entirely ignored.

113. In a review of sample studies submitted by Defendants to Allstate in support of claims for reimbursement, there were abnormalities with such parameters as latencies, amplitudes and nerve conduction velocities that were not accounted for in the final diagnoses. Although these abnormalities typically are hallmarks of various types of neuropathy, none of abnormal parameters were noted in Mun's reports, and no explanation of or accounting for them occurred in the final diagnoses. A table identifying 26 sample NCV studies containing abnormal parameters which were submitted by Nara Rehab to Allstate for reimbursement, is annexed hereto as Exhibit "I."

114. On information and belief, the understanding of abnormal parameters such as latency, amplitude and nerve conduction velocity are critical and fundamental to the practice of medicine and successful diagnosis of a patient's condition.

115. On information and belief, were the reported abnormal data values submitted by Defendants to Allstate true, and the cause of the apparent neuropathy not diagnosed and treated, the “patient” would be placed at risk for progressive neurological disorders and/or underlying disease.

116. On information and belief, the abnormal data values were ignored by Mun because he knew the results were contrived and that there was nothing wrong with the Covered Persons on whom the tests were purportedly administered.

C. EMG Fraud

117. On information and belief, in addition to committing thousands of acts of mail fraud by the submission of fraudulent NCV data to Allstate in connection with claims for reimbursement, Defendants, as a matter of procedure, practice and protocol, routinely submitted, through Nara Rehab, bills for reimbursement to Allstate for EMG tests that reflected services that were invalid, materially misrepresented, fabricated, of no diagnostic value, and/or never performed as billed.

1. Over-diagnosis of Radiculopathy

118. On information and belief, accepted medical literature and published studies have determined that the rate of abnormal EMGs and NCVs typically seen in ambulatory patients who have been involved in motor vehicular accidents, such as those purportedly treated at Nara Rehab, is in the range of 1-5%.

119. Contrary to the published reports concerning ambulatory post motor vehicle accident patients diagnosed with radiculopathy, Mun diagnosed cervical radiculopathy in 17 out of 47 (36%) of the reviewed studies and lumbosacral radiculopathy in 22 out of 46 of the reviewed studies as identified in a table annexed hereto as Exhibit “J.”

120. On information and belief, the difference in the frequency of radiculopathy between what is typically found in ambulatory post-motor vehicle accident patients and the radiculopathy rate purportedly found by Mun in the random sample studies is indicative of fraud and an intentional misrepresentation of the electrodiagnostic studies for which Defendants billed Allstate.

121. The false diagnosis of radiculopathy by Defendants in the random sample studies reflect a disregard for the welfare of the patients, since the wrong diagnosis could result in selection of the wrong treatment plan.

Misrepresentation of the Levels of Radiculopathy:

2. Improbable Root Levels Radiculopathy

122. The levels of cervical radiculopathy diagnosed by Mun, through Nara Rehab, are atypical of those seen in legitimate medical practices and are contrary to the known distribution of nerve root involvement in radiculopathy in which published studies have found most cervical radiculopathies occur at C7 (46%-76%) or C8 (4%-15%).

123. Contrary to published studies and accepted medical authorities, in a review of 47 random sample cervical radiculopathy studies purportedly performed by Mun, he diagnosed 41% of the cervical radiculopathies at C5 and 35% at C6, with only 24% having radiculopathy at the C7 level, and none (0%) at the C8 level.

124. The pattern of root levels seen in 47 random sample cervical radiculopathy studies are so medically improbable as compared with Gold Standard published medical studies that these alleged findings cannot be the product of mere incompetence, but rather reflect intentional material misrepresentations as to the services, if any, provided. A table identifying random sample cervical radiculopathy studies in which Mun falsely claimed to diagnose

radiculopathy that were submitted to Allstate for reimbursement is annexed hereto as Exhibit "K."

125. The levels of lumbosacral radiculopathy diagnosed in 22 random sample EMG studies submitted by Mun, through Nara Rehab, to Allstate in support of claims for reimbursement of Electrodiagnostic Testing are atypical of those seen in legitimate medical practices and are contrary to the known distribution of nerve root involvement in radiculopathy in which published studies have found most lumbar radiculopathies to occur at L5 or S1 (76%-90%).

126. Contrary to published studies and accepted medical authorities, in a review of the 22 random sample lumbar radiculopathy studies purportedly performed by Mun, he diagnosed 59% of the lumbar radiculopathies at the L5 level and none at the S1 level.

127. The pattern of root levels seen in 22 random sample lumbar radiculopathy studies is so medically improbable as compared with Gold Standard published medical studies that they cannot be the product of mere incompetence, but rather reflect intentional material misrepresentations as to the services, if any, provided. A table identifying 22 random sample studies, which reflect false diagnoses for lumbosacral radiculopathy is annexed hereto as Exhibit "L."

128. Similar to Mun's false diagnoses of cervical radiculopathy, his purported diagnosis based on lumbosacral radiculopathy studies was also at gross deviation from what one would expect in a legitimate medical practice and, as such, the findings reported by Mun are indicative of willful misrepresentations and fraud.

3. Improbable Paraspinal and Limb Findings

129. On information and belief, the pattern of abnormalities in the paraspinals versus the limbs indicated in the medical reports submitted by Defendants to Allstate in support of claims for reimbursement is completely unlike what is seen in medical literature and practice. It is commonly accepted in the medical community that approximately one-third (33.3%) of radiculopathy cases will have EMG findings only in the paraspinal muscles, one-third (33.3%) will have findings only in limb muscles, and one third (33.3%) will have abnormal findings in both the paraspinals and the limb muscles.

130. Notwithstanding the foregoing, in a review of 39 random sample EMG studies submitted by Defendants to Allstate for reimbursement where radiculopathy was diagnosed, the paraspinals had only positive findings in 31%; there were no positive findings in any of the limb muscles, only; and the limbs and paraspinals both had positive EMG findings in 69%. The foregoing ratio is medically unlikely, and highly indicative that the findings made by Mun were fabricated and/or materially misrepresented. A table identifying the 39 random sample studies is annexed hereto as Exhibit "M."

4. Diagnosis not Justified by the Reported Findings

131. In a review of 93 random sample EMG studies submitted by Defendants to Allstate for reimbursement, Mun made a diagnosis that could not be justified by the reported findings in 31 (33%) of them, since: (1) the number of muscles tested by Mun was insufficient; (2) the H-reflex data was incompatible with the diagnosis; and/or (3) the diagnosis failed to recognize the presence of a conduction block. The 31 random sample studies where Mun misrepresented the diagnosis based on an invalid EMG are identified in Exhibit "N," annexed hereto.

132. By making unsupported diagnoses, Mun endangered the health and welfare of his patients by potentially exposing them to incorrect treatment by other healthcare professionals who might rely on their findings, as well as billed Allstate for services that were not rendered as billed and were of no diagnostic value.

133. On information and belief, Mun's reports reflect unsupported diagnoses because he knew that the studies were bogus, fictitious, and not intended to actually diagnose a Covered Person's medical condition, but instead, intended solely to generate payments from insurance companies, in general, and Allstate, in particular.

5. Diagnosis Did Not Take Into Account Other Possible Pathologies

134. In numerous other instances with respect to EMGs, Mun made diagnoses that were not supported by the electrodiagnostic findings submitted by Nara Rehab to Allstate for reimbursement. Based on a sample of 93 electrodiagnostic studies, 73 studies (78%) contained diagnoses that did not take into account other possible pathologies, meaning that they failed to report the required differential diagnoses. A table identifying the 73 studies in which the medical records failed to support the diagnosis made by Mun is annexed hereto as Exhibit "O."

135. By making unsupported diagnoses, Mun endangered the health and welfare of his patients by potentially exposing them to incorrect treatment by other healthcare professionals who might rely on his findings.

136. On information and belief, Mun's failure to note abnormalities that indicate that other diagnoses, such as conduction block and carpal tunnel syndrome, were potentially present was a misrepresentation of the services rendered. If these studies were actually performed, Mun's failure to account for these pathologies could have potentially harmed

the patient by resulting in improper treatment, and in so doing, Mun showed a disregard for the standard of medical practice.

137. On information and belief, Mun failed to consider other possible patient pathologies because he knew that the studies were bogus, fictitious, and not intended to actually diagnose a Covered Person's medical condition, but instead, intended solely to generate payments from insurance companies, in general, and Allstate, in particular.

6. Medically Unacceptable Utilization of Protocol Approach to Selection of Muscles for EMG

138. In a review of 92 representative EMG studies, Mun utilized a protocol approach to the selection of muscles in 88 of the studies (96%), regardless of the patient's symptoms or findings. A table identifying such representative instances is annexed hereto as Exhibit "P."

139. A protocol approach to electrodiagnostic studies is clinically unacceptable and does not meet the standard required for billing for services under the applicable CPT code and therefore bills submitted by Defendants to Allstate in connection therewith were fraudulent and potentially exposed the patients to an incorrect diagnosis and treatment plan.

140. With respect to the EMGs, as a matter of practice, procedure and protocol, Defendants fraudulently billed for such services when in fact they were not rendered as billed and, when they were performed, tested an inadequate number of limb muscles, thereby rendering the EMG medically invalid and misrepresenting that they had performed a "complete" EMG as required by the AMA for utilization of CPT code 95861. By way of example and not limitation, instances where the EMG reports failed to demonstrate that a complete EMG was performed are found in Exhibit "Q," annexed hereto.

141. The standard, and only medically valid and accepted practice in electromyography, is to perform EMG testing on a minimum of five muscles per limb with required testing of additional limb muscles if abnormalities are found.

142. To bill for EMGs under CPT codes 95861 though 95864, the AMA requires a complete study.

143. Failure to test and study the minimum number of limb muscles is violative of the AMA requirements for the use of the applicable CPT codes.

144. On information and belief, EMG testing of five or more muscles per limb is required to reliably diagnose the absence of radiculopathy in a limb or determine the spinal level of the radiculopathy if radiculopathy is indeed present.

145. On information and belief, failure to perform EMG testing of at least five limb muscles renders the EMG invalid and misleading for purposes of making a diagnosis (positive or negative) relating to radiculopathy. In that regard, Mun routinely, intentionally and fraudulently billed Allstate for EMGs that failed to study a sufficient number of muscles per limb to constitute a valid EMG. A table identifying instances where Mun, through Nara Rehab, billed for electrodiagnostic studies where he failed to test or study a sufficient number of muscles per limb is annexed hereto as Exhibit "Q."

7. Improper Specific Root Diagnoses Made Solely on the Basis of Paraspinal Findings

146. In a review of 39 random sample EMG studies submitted by Defendants to Allstate for reimbursement in which radiculopathy was diagnosed, the level of the radiculopathy was determined solely from the paraspinal abnormalities in 12 (31%) of the studies. A table identifying the 12 random sample studies where Mun falsely claimed to diagnose radiculopathy based solely on a paraspinal examination is in annexed hereto as Exhibit "R."

147. On information and belief, while the paraspinal muscles are useful indicators of radiculopathy at some level, the exact level of radiculopathy cannot reliably be determined solely from the paraspinal examination, and Mun's diagnoses based thereon, constituted a material misrepresentation and was false when made.

148. On information and belief, Mun's purported diagnosis of the exact root level(s) of radiculopathy based solely on findings in the paraspinal muscles was fraudulent, and constituted a material misrepresentation of medical fact.

DISCOVERY OF THE FRAUD

149. On information and belief, to induce Allstate to promptly reimburse their claims for Electrodiagnostic Testing, Defendants have gone to great lengths to systematically conceal their fraud.

150. Allstate was under a statutory and contractual obligation to promptly and fairly process Defendants' claims within 30 days. The documents submitted to Allstate in support of the Electrodiagnostic Testing at issue, combined with the material misrepresentations, omissions, and acts of fraudulent concealment described above, were designed to and did cause Allstate to justifiably rely on them. As a proximate result, Allstate has incurred damages of more than \$500,000.00 based upon the fraudulent bill submissions.

151. Based upon Defendants' material misrepresentations and other affirmative acts to conceal their fraud from Allstate, Allstate did not discover, and should not have reasonably discovered, that its damages were attributable to fraud until shortly before they filed this Complaint.

STATEMENT OF CLAIMS

**FIRST CLAIM FOR RELIEF
AGAINST MUN**

(RICO, pursuant to 18 U.S.C § 1962(c))

152. The allegations of paragraphs 1 through 151 are hereby repeated and realleged as though fully set forth herein.

THE RICO ENTERPRISE

153. At all times relevant herein, Nara Rehab was an “enterprise” engaged in, or the activities of which affect, interstate commerce, as that term is defined by 18 U.S.C. § 1961(4), and within the meaning of 18 U.S.C. § 1962(c).

154. From in or about October 2007 through the date of the filing of this Complaint, Mun conducted and participated in the affairs of the Nara Rehab enterprise through a pattern of racketeering activity, including the many hundreds of acts of mail fraud described herein, in the representative list of predicate acts, annexed hereto, all of which are incorporated by reference. Defendant’s conduct constitutes a violation of 18 U.S.C. § 1962(c).

155. At all relevant times mentioned herein, Mun exerted control over, and directed the operations of the Nara Rehab enterprise. Mun utilized that control to conduct the pattern of racketeering activities that consisted of creating, submitting and/or causing to be submitted the fraudulent bills and supporting documents to Allstate Insurance Company that were based, in part, on Electrodiagnsostic Testing that was not rendered as billed and/or fabricated and/or of no diagnostic value.

The Pattern of Racketeering Activity
(Racketeering Acts)

156. The racketeering acts set forth herein were carried out on a continued basis over a four year period, were related and similar, and were committed as part of Mun's ongoing scheme to fraudulently bill for Electrodiagnostic Testing to defraud insurers and, if not stopped, will continue into the future.

157. On information and belief, this pattern of racketeering activity poses a specific threat of repetition extending indefinitely into the future, inasmuch as Nara Rehab continues to pursue collection on the fraudulent billing to the present day.

158. As a part of the pattern of racketeering activity, and for the purpose of executing the scheme and artifice to defraud as described above, Mun caused mailings to be made through the United States Postal Service, in violation of 18 U.S.C. § 1341. The mailings were made in furtherance of a scheme or artifice to defraud Allstate and to induce Allstate to issue checks to the Nara Rehab enterprise based upon materially false and misleading information.

159. Through the Nara Rehab enterprise, Mun submitted hundreds of fraudulent claim forms seeking payment for Electrodiagnostic Testing that was not performed as billed and/or fabricated and/or of no diagnostic value. The bills and supporting documents that were sent by Mun and/or others acting under his direction and control, as well as the payments that Allstate made in response to those bills, were sent through the United States Postal Service. By virtue of those activities, Mun engaged in a continuous series of predicate acts of mail fraud, extending from the formation of the Nara Rehab enterprise through the filing of this Complaint.

160. A sample list of predicate acts is annexed hereto which identifies the nature and date of mailings that were made by Mun in furtherance of the scheme as well as the specific misrepresentations identified for each of the mailings.

161. Mail fraud constitutes racketeering activity as that term is defined in 18 U.S.C. § 1961(1)(b).

162. Each submission of a fraudulent claim constitutes a pattern of racketeering activity within the meaning of 18 U.S.C. § 1961(5).

Damages

163. By reason of the foregoing violation of 18 U.S.C. § 1962(c), Allstate Insurance Company has been injured in its business and property and Allstate has been damaged in the aggregate amount presently in excess of \$500,000.00, the exact amount to be determined at trial.

164. Pursuant to 18 U.S.C. § 1964(c), Allstate entitled to recover from Mun, jointly and severally, three-fold damages sustained by it, together with the costs of this lawsuit and reasonable attorneys' fees.

**SECOND CLAIM FOR RELIEF
AGAINST ALL DEFENDANTS**

(Common Law Fraud)

165. The allegations of paragraphs 1 through 151 are hereby repeated and realleged as though fully set forth herein.

166. Defendants Mun and Nara Rehab intentionally, knowingly, fraudulently, and with an intent to deceive Allstate, made numerous false and misleading statements of material fact as to the necessity of the medical services purportedly rendered and that the medical services were provided when in fact they were not, thereby inducing Allstate to make payments

to Defendants that Defendants were not entitled to because of their fraudulent nature. As part of the fraudulent scheme implemented by Mun, Nara Rehab made material misrepresentations and/or omitted material statements in submitting No-fault claims to Allstate for payment.

167. Defendants Mun and Nara Rehab intentionally, knowingly, fraudulently, and with the intent to commit and facilitate billing fraud and deceive Allstate, concealed the fact that the bills submitted to Allstate for reimbursement of No-fault benefits for services relating to the performance of Electrodiagnostic Testing were misrepresented.

168. Defendants Mun and Nara Rehab intentionally, knowingly, fraudulently, and with the intent to commit and facilitate billing fraud and deceive Allstate, concealed the fact that, in many instances, the services relating to Electrodiagnostic Testing were of no diagnostic value.

169. Defendants Mun and Nara Rehab intentionally, knowingly, fraudulently, and with the intent to commit and facilitate billing fraud and deceive Allstate, concealed the fact that the services were provided pursuant to a protocol that was intended to maximize Defendants' profit and reimbursement of payments from the Allstate, as opposed to medical necessity.

170. On information and belief, Defendants intentionally, knowingly, fraudulently, and with the intent to deceive, submitted patient medical records, reports, treatment verifications and bills for medical treatment which contained false representations of material facts, including but not limited to the following fraudulent material misrepresentations:

- False and misleading statements and information designed to conceal the fact that the treatment and Electrodiagnostic Testing for said injury were not rendered as billed and/or were fabricated and/or misrepresented;
- False and misleading statements and information as to the results of the Electrodiagnostic Testing as well as the diagnosis, for said injury;

- False and misleading test results for Electrodiagnostic Testing, which, in most instances, was improperly performed and of no diagnostic value;
- False and misleading test results, reports and bill that sought reimbursement for Electrodiagnostic Testing when in fact, in many instances, such services were not rendered as billed; and
- Other misrepresentations, including but not limited to those contained in paragraphs 1 through 151 above.

171. On information and belief, in numerous instances, the medical records, reports and bills submitted by Defendants to Allstate in connection with Electrodiagnostic Testing set forth fictional findings, diagnoses and representations of the services provided. The false representations contained therein not only were intended to defraud Allstate but constitute a grave and serious danger to the Covered Persons and the consumer public, particularly if the sham and fictional diagnoses and test results were to be relied upon by any subsequent healthcare provider.

172. The foregoing was intended to deceive and mislead the Allstate into believing that Mun, through Nara Rehab, was providing medically valid services when in fact he was not.

173. Defendants knew the foregoing material misrepresentations to be false when made and nevertheless made these false representations with the intention and purpose of inducing Allstate to rely thereon.

174. Allstate did in fact reasonably and justifiably rely on the foregoing material misrepresentations, which Allstate was led to believe existed as a result of Defendants' acts of fraud and deception.

175. Had Allstate known of the fraudulent content of, and misrepresentations in, the medical records, reports, treatment verifications, and bills for medical treatment, it would

not have paid Nara Rehab's claims for No-fault insurance benefits submitted in connection therewith.

176. Furthermore, Defendants' far reaching pattern of fraudulent conduct evinces a high degree of moral turpitude and wanton dishonesty which, as alleged above, has harmed, and will continue to harm, the public at large, thus entitling Allstate to recovery of exemplary and punitive damages.

177. By reason of the foregoing, Allstate has sustained compensatory damages and been injured in its business and property in an amount as yet to be determined, but believed to be in excess of \$500,00.00, the exact amount to be determined at trial, plus interest, costs, punitive damages and other relief the Court deems just.

**THIRD CLAIM FOR RELIEF
AGAINST ALL DEFENDANTS**

(Unjust Enrichment)

178. The allegations of paragraphs 1 through 151 are hereby repeated and realleged as though fully set forth herein.

179. By reason of their wrongdoing, Defendants have been unjustly enriched, in that they have, directly and/or indirectly, received monies from Allstate that are the result of unlawful conduct and that, in equity and good conscience, they should not be permitted to keep.

180. Allstate is therefore entitled to restitution from Defendants in the amount by which Defendants have been unjustly enriched.

181. By reason of the foregoing, Allstate has sustained compensatory damages and been injured in its business and property in an amount as yet to be determined, but believed to be in excess of \$500,000.00, the exact amount to be determined at trial, plus interest, costs and other relief the Court deems just.

JURY DEMAND

182. Pursuant to Federal Rule of Civil Procedure 38(b), Allstate demands a trial by jury.

WHEREFORE, Allstate demands judgment as follows:

- (i) Treble damages, costs and reasonable attorneys' fees on the First Claim for Relief, together with prejudgment interest;
- (ii) Compensatory damages in an amount in excess of \$500,00.00, the exact amount to be determined at trial, together with prejudgment interest on the Second and Third Claims for Relief;
- (iii) Punitive damages in such amount as the Court deems just; and
- (iv) Costs, reasonable attorneys' fees and such other relief that the Court deems just and proper.

Dated: New York, New York
July 31, 2012

Stern & Montana, LLP

By: 

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APPENDIX

PREDICATE ACTS

COVERED PERSON/CLAIM NUMBER	DOCUMENTS MAILED	MAILED BY	MAILED TO	APPROX. DATE OF MAILING	MISREPRESENTATIONS INCLUDE
K.C. 4816805834-01	NF-3 bill for EMGs, NCVs, and F wave study, for date of service 3/14/2008, with attached reports and assignment of benefits.	Nara Rehab Medical, P.C.	Allstate	3/14/2008	<p>1. Services provided as part of pattern of fraudulent treatment protocol and unnecessary/improper services.</p> <p>2. False and misleading statements and information that intentionally concealed the fact that the Electrodagnostic Testing was medically unnecessary.</p> <p>3. False and misleading statements and information as to the results of treatment and Electrodagnostic Testing, as well as the diagnosis, for alleged injury.</p> <p>4. False and misleading test results for Electrodagnostic Testing, which was of no diagnostic value.</p> <p>5. On information and belief, Electrodagnostic Testing were never rendered as billed.</p>

PREDICATE ACTS

COVERED PERSON/ CLAIM NUMBER	DOCUMENTS MAILED	MAILED BY	MAILED TO	APPROX. DATE OF MAILING	MISREPRESENTATIONS INCLUDED
Y.N.K. 4145820454-02	NF-3 bill for EMGs, NCVs, and F wave study, for date of service 4/4/2011, with attached reports and assignment of benefits.	Nara Rehab Medical, P.C.	Allstate	4/5/2011	<p>1. Services provided as part of pattern of fraudulent treatment protocol and unnecessary/improper services.</p> <p>2. False and misleading statements and information that intentionally concealed the fact that the Electrodagnostic Testing was medically unnecessary.</p> <p>3. False and misleading statements and information as to the results of treatment and Electrodagnostic Testing, as well as the diagnosis, for alleged injury.</p> <p>4. False and misleading test results for Electrodagnostic Testing, which was of no diagnostic value.</p> <p>5. On information and belief, Electrodagnostic Testing were never rendered as billed.</p>

PREDICATE ACTS

COVERED PERSON/ CLAIM NUMBER	DOCUMENTS MAILED	MAILED BY	MAILED TO	APPROX. DATE OF MAILING	MISREPRESENTATIONS INCLUDED
K.L. 4145674869-02	NF-3 bill for EMGs, NCVs, and F wave study, for date of service 2/3/2010, with attached reports and assignment of benefits.	Nara Rehab Medical, P.C.	Allstate	2/15/2010	<p>1. Services provided as part of pattern of fraudulent treatment protocol and unnecessary/improper services.</p> <p>2. False and misleading statements and information that intentionally concealed the fact that the Electrodagnostic Testing was medically unnecessary.</p> <p>3. False and misleading statements and information as to the results of treatment and Electrodagnostic Testing, as well as the diagnosis, for alleged injury.</p> <p>4. False and misleading test results for Electrodagnostic Testing, which was of no diagnostic value.</p> <p>5. On information and belief, Electrodagnostic Testing were never rendered as billed.</p>

PREDICATE ACTS

COVERED PERSON/ CLAIM NUMBER	DOCUMENTS MAILED BY	MAILED TO	APPROX. DATE OF MAILING	MISREPRESENTATIONS INCLUDED	
R.S. 4145512796-02	NF-3 bill for EMGs, NCVs, and F wave study, for date of service 1/15/2009, with attached reports and assignment of benefits.	Nara Rehab Medical, P.C.	Allstate	1/15/2009	<p>Services provided as part of pattern of fraudulent treatment protocol and unnecessary/improper services.</p> <p>2. False and misleading statements and information that intentionally concealed the fact that the Electrodagnostic Testing was medically unnecessary.</p> <p>3. False and misleading statements and information as to the results of treatment and Electrodagnostic Testing, as well as the diagnosis, for alleged injury.</p> <p>4. False and misleading test results for Electrodagnostic Testing, which was of no diagnostic value.</p> <p>5. On information and belief, Electrodagnostic Testing were never rendered as billed.</p>

PREDICATE ACTS

COVERED PERSON/ CLAIM NUMBER	DOCUMENTS MAILED	MAILED BY	MAILED TO	APPROX. DATE OF MAILING	MISREPRESENTATIONS INCLUDE
S.K.L. 4145384535-01	NF-3 bill for EMGs, NCVs, and F wave study, for date of service 3/7/2008, with attached reports and assignment of benefits.	Nara Rehab Medical, P.C.	Allstate	3/7/2008	<p>1. Services provided as part of pattern of fraudulent treatment protocol and unnecessary/improper services.</p> <p>2. False and misleading statements and information that intentionally concealed the fact that the Electrodagnostic Testing was medically unnecessary.</p> <p>3. False and misleading statements and information as to the results of treatment and Electrodagnostic Testing, as well as the diagnosis, for alleged injury.</p> <p>4. False and misleading test results for Electrodagnostic Testing, which was of no diagnostic value.</p> <p>5. On information and belief, Electrodagnostic Testing were never rendered as billed.</p>

PREDICATE ACTS

COVERED PERSON/ CLAIM NUMBER	DOCUMENTS MAILED	MAILED BY	MAILED TO	APPROX. DATE OF MAILING	MISREPRESENTATIONS INCLUDE
S.K.K. 4145339828-14	NF-3 bill for EMGs, NCVs, and F wave study, for date of service 1/28/2008, with attached reports and assignment of benefits.	Nara Rehab Medical, P.C.	Allstate	1/28/2008	<p>1. Services provided as part of pattern of fraudulent treatment protocol and unnecessary/improper services.</p> <p>2. False and misleading statements and information that intentionally concealed the fact that the Electrodagnostic Testing was medically unnecessary.</p> <p>3. False and misleading statements and information as to the results of treatment and Electrodagnostic Testing, as well as the diagnosis, for alleged injury.</p> <p>4. False and misleading test results for Electrodagnostic Testing, which was of no diagnostic value.</p> <p>5. On information and belief, Electrodagnostic Testing were never rendered as billed.</p>

PREDICATE ACTS

COVERED PERSON/ CLAIM NUMBER	DOCUMENTS MAILED	MAILED BY	MAILED TO	APPROX. DATE OF MAILING	MISREPRESENTATIONS INCLUDE
B.J.H. 2127070072-03	NF-3 bill for EMGs, NCVs, and F wave study, for date of service 9/18/2008, with attached reports and assignment of benefits.	Nara Rehab Medical, P.C.	Allstate	9/18/2008	<p>1. Services provided as part of pattern of fraudulent treatment protocol and unnecessary/improper services.</p> <p>2. False and misleading statements and information that intentionally concealed the fact that the Electrodagnostic Testing was medically unnecessary.</p> <p>3. False and misleading statements and information as to the results of treatment and Electrodagnostic Testing, as well as the diagnosis, for alleged injury.</p> <p>4. False and misleading test results for Electrodagnostic Testing, which was of no diagnostic value.</p> <p>5. On information and belief, Electrodagnostic Testing were never rendered as billed.</p>

PREDICATE ACTS

COVERED PERSON/ CLAIM NUMBER	DOCUMENTS MAILED	MAILED BY	MAILED TO	APPROX. DATE OF MAILING	MISREPRESENTATIONS INCLUDE
H.J.P. 2126959465-03	NF-3 bill for EMGs, NCVs, and F wave study, for date of service 3/28/2008, with attached reports and assignment of benefits.	Nara Rehab Medical, P.C.	Allstate	3/28/2008	<p>1. Services provided as part of pattern of fraudulent treatment protocol and unnecessary/improper services.</p> <p>2. False and misleading statements and information that intentionally concealed the fact that the Electrodagnostic Testing was medically unnecessary.</p> <p>3. False and misleading statements and information as to the results of treatment and Electrodagnostic Testing, as well as the diagnosis, for alleged injury.</p> <p>4. False and misleading test results for Electrodagnostic Testing, which was of no diagnostic value.</p> <p>5. On information and belief, Electrodagnostic Testing were never rendered as billed.</p>

PREDICATE ACTS

COVERED PERSON/ CLAIM NUMBER	DOCUMENTS MAILED	MAILED BY	MAILED TO	APPROX. DATE OF MAILING	MISREPRESENTATIONS INCLUDE
J.K. 0188935175-01	NF-3 bill for EMGs, NCVs, and F wave study, for date of service 3/4/2011, with attached reports and assignment of benefits.	Nara Rehab Medical, P.C.	Allstate	3/8/2011	<p>1. Services provided as part of pattern of fraudulent treatment protocol and unnecessary/improper services.</p> <p>2. False and misleading statements and information that intentionally concealed the fact that the Electrodagnostic Testing was medically unnecessary.</p> <p>3. False and misleading statements and information as to the results of treatment and Electrodagnostic Testing, as well as the diagnosis, for alleged injury.</p> <p>4. False and misleading test results for Electrodagnostic Testing, which was of no diagnostic value.</p> <p>5. On information and belief, Electrodagnostic Testing were never rendered as billed.</p>

PREDICATE ACTS

COVERED PERSON/ CLAIM NUMBER	DOCUMENTS MAILED	MAILED BY	MAILED TO	APPROX. DATE OF MAILING	MISREPRESENTATIONS INCLUDE
J.L. 018444727-01	NF-3 bill for EMGs, NCVs, and F wave study, for date of service 1/28/2011, with attached reports and assignment of benefits.	Nara Rehab Medical, P.C.	Allstate	2/3/2011	<p>1. Services provided as part of pattern of fraudulent treatment protocol and unnecessary/improper services.</p> <p>2. False and misleading statements and information that intentionally concealed the fact that the Electrodagnostic Testing was medically unnecessary.</p> <p>3. False and misleading statements and information as to the results of treatment and Electrodagnostic Testing, as well as the diagnosis, for alleged injury.</p> <p>4. False and misleading test results for Electrodagnostic Testing, which was of no diagnostic value.</p> <p>5. On information and belief, Electrodagnostic Testing were never rendered as billed.</p>

PREDICATE ACTS

COVERED PERSON/ CLAIM NUMBER	DOCUMENTS MAILED BY CLAIM NUMBER	MAILED BY	MAILED TO	APPROX. DATE OF MAILING	MISREPRESENTATIONS INCLUDED
H. D. C 0183619808-01	NF-3 bill for EMGs, NCVs, and F wave study, for date of service 1/10/2011, with attached reports and assignment of benefits.	Nara Rehab Medical, P.C.	Allstate	1/26/2011	<p>1. Services provided as part of pattern of fraudulent treatment protocol and unnecessary/improper services.</p> <p>2. False and misleading statements and information that intentionally concealed the fact that the Electrodagnostic Testing was medically unnecessary.</p> <p>3. False and misleading statements and information as to the results of treatment and Electrodagnostic Testing, as well as the diagnosis, for alleged injury.</p> <p>4. False and misleading test results for Electrodagnostic Testing, which was of no diagnostic value.</p> <p>5. On information and belief, Electrodagnostic Testing were never rendered as billed.</p>

PREDICATE ACTS

COVERED PERSON/ CLAIM NUMBER	DOCUMENTS MAILED BY	MAILED TO	APPROX. DATE OF MAILING	MISREPRESENTATIONS INCLUDE
C.K. 0181491457-01	NF-3 bill for EMGs, NCVs, and F wave study, for date of service 12/28/2010, with attached reports and assignment of benefits.	Nara Rehab Medical, P.C.	Allstate	1/11/2011

PREDICATE ACTS

COVERED PERSON/ CLAIM NUMBER	DOCUMENTS MAILED BY	MAILED TO	APPROX. DATE OF MAILING	MISREPRESENTATIONS INCLUDE
M.P. 0178083267-01	NF-3 bill for EMGs, NCVs, and F wave study, for date of service 11/2/2010, with attached reports and assignment of benefits.	Nara Rehab Medical, P.C.	Allstate	<p>11/2/2010</p> <p>1. Services provided as part of pattern of fraudulent treatment protocol and unnecessary/improper services.</p> <p>2. False and misleading statements and information that intentionally concealed the fact that the Electrodagnostic Testing was medically unnecessary.</p> <p>3. False and misleading statements and information as to the results of treatment and Electrodagnostic Testing, as well as the diagnosis, for alleged injury.</p> <p>4. False and misleading test results for Electrodagnostic Testing, which was of no diagnostic value.</p> <p>5. On information and belief, Electrodagnostic Testing were never rendered as billed.</p>

PREDICATE ACTS

COVERED PERSON/ CLAIM NUMBER	DOCUMENTS MAILED	MAILED BY	MAILED TO	APPROX. DATE OF MAILING	MISREPRESENTATIONS INCLUDE
M.S. 0173331983-04	NF-3 bill for EMGs, NCVs, and F wave study, for date of service 9/3/2010, with attached reports and assignment of benefits.	Nara Rehab Medical, P.C.	Allstate	9/8/2010	<p>1. Services provided as part of pattern of fraudulent treatment protocol and unnecessary/improper services.</p> <p>2. False and misleading statements and information that intentionally concealed the fact that the Electrodagnostic Testing was medically unnecessary.</p> <p>3. False and misleading statements and information as to the results of treatment and Electrodagnostic Testing, as well as the diagnosis, for alleged injury.</p> <p>4. False and misleading test results for Electrodagnostic Testing, which was of no diagnostic value.</p> <p>5. On information and belief, Electrodagnostic Testing were never rendered as billed.</p>

PREDICATE ACTS

COVERED PERSON/ CLAIM NUMBER	DOCUMENTS MAILED	MAILED BY	MAILED TO	APPROX. DATE OF MAILING	MISREPRESENTATIONS INCLUDE
H.K. 0170751432-12	NF-3 bill for EMGs, NCVs, and F wave study, for date of service 8/20/2010, with attached reports and assignment of benefits.	Nara Rehab Medical, P.C.	Allstate	8/20/2010	<p>1. Services provided as part of pattern of fraudulent treatment protocol and unnecessary/improper services.</p> <p>2. False and misleading statements and information that intentionally concealed the fact that the Electrodagnostic Testing was medically unnecessary.</p> <p>3. False and misleading statements and information as to the results of treatment and Electrodagnostic Testing, as well as the diagnosis, for alleged injury.</p> <p>4. False and misleading test results for Electrodagnostic Testing, which was of no diagnostic value.</p> <p>5. On information and belief, Electrodagnostic Testing were never rendered as billed.</p>

PREDICATE ACTS

COVERED PERSON/ CLAIM NUMBER	DOCUMENTS MAILED	MAILED BY	MAILED TO	APPROX. DATE OF MAILING	MISREPRESENTATIONS INCLUDE
C.H.H. 0168897105-02	NF-3 bill for EMGs, NCVs, and F wave study, for date of service 7/16/2010, with attached reports and assignment of benefits.	Nara Rehab Medical, P.C.	Allstate	7/20/2010	<p>1. Services provided as part of pattern of fraudulent treatment protocol and unnecessary/improper services.</p> <p>2. False and misleading statements and information that intentionally concealed the fact that the Electrodagnostic Testing was medically unnecessary.</p> <p>3. False and misleading statements and information as to the results of treatment and Electrodagnostic Testing, as well as the diagnosis, for alleged injury.</p> <p>4. False and misleading test results for Electrodagnostic Testing, which was of no diagnostic value.</p> <p>5. On information and belief, Electrodagnostic Testing were never rendered as billed.</p>

PREDICATE ACTS

COVERED PERSON/ CLAIM NUMBER	DOCUMENTS MAILED	MAILED BY	MAILED TO	APPROX. DATE OF MAILING	MISREPRESENTATIONS INCLUDE
S.K. 0166546341-03	NF-3 bill for EMGs, NCVs, and F wave study, for date of service 7/15/2010, with attached reports and assignment of benefits.	Nara Rehab Medical, P.C.	Allstate	8/2/2010	<p>1. Services provided as part of pattern of fraudulent treatment protocol and unnecessary/improper services.</p> <p>2. False and misleading statements and information that intentionally concealed the fact that the Electrodagnostic Testing was medically unnecessary.</p> <p>3. False and misleading statements and information as to the results of treatment and Electrodagnostic Testing, as well as the diagnosis, for alleged injury.</p> <p>4. False and misleading test results for Electrodagnostic Testing, which was of no diagnostic value.</p> <p>5. On information and belief, Electrodagnostic Testing were never rendered as billed.</p>

PREDICATE ACTS

COVERED PERSON/CLAIM NUMBER	DOCUMENTS MAILED	MAILED BY	MAILED TO	APPROX. DATE OF MAILING	MISREPRESENTATIONS INCLUDED
H.K. 0165932211-01	NF-3 bill for EMGs, NCVs, and F wave study, for date of service 6/23/2010, with attached reports and assignment of benefits.	Nara Rehab Medical, P.C.	Allstate	6/24/2010	<p>1. Services provided as part of pattern of fraudulent treatment protocol and unnecessary/improper services.</p> <p>2. False and misleading statements and information that intentionally concealed the fact that the Electrodagnostic Testing was medically unnecessary.</p> <p>3. False and misleading statements and information as to the results of treatment and Electrodagnostic Testing, as well as the diagnosis, for alleged injury.</p> <p>4. False and misleading test results for Electrodagnostic Testing, which was of no diagnostic value.</p> <p>5. On information and belief, Electrodagnostic Testing were never rendered as billed.</p>

PREDICATE ACTS

COVERED PERSON/ CLAIM NUMBER	DOCUMENTS MAILED	MAILED BY	MAILED TO	APPROX. DATE OF MAILING	MISREPRESENTATIONS INCLUDE
J.I. 0162605380-04	NF-3 bill for EMGs, NCVs, and F wave study, for date of service 5/24/2010, with attached reports and assignment of benefits.	Nara Rehab Medical, P.C.	Allstate	5/25/2010	<p>1. Services provided as part of pattern of fraudulent treatment protocol and unnecessary/improper services.</p> <p>2. False and misleading statements and information that intentionally concealed the fact that the Electrodagnostic Testing was medically unnecessary.</p> <p>3. False and misleading statements and information as to the results of treatment and Electrodagnostic Testing, as well as the diagnosis, for alleged injury.</p> <p>4. False and misleading test results for Electrodagnostic Testing, which was of no diagnostic value.</p> <p>5. On information and belief, Electrodagnostic Testing were never rendered as billed.</p>

PREDICATE ACTS

COVERED PERSON/ CLAIM NUMBER	DOCUMENTS MAILED	MAILED BY	MAILED TO	APPROX. DATE OF MAILING	MISREPRESENTATIONS INCLUDE
A.J.K. 0157110636-03	NF-3 bill for EMGs, NCVs, and F wave study, for date of service 2/17/2010, with attached reports and assignment of benefits.	Nara Rehab Medical, P.C.	Allstate	2/22/2010	<p>1. Services provided as part of pattern of fraudulent treatment protocol and unnecessary/improper services.</p> <p>2. False and misleading statements and information that intentionally concealed the fact that the Electrodagnostic Testing was medically unnecessary.</p> <p>3. False and misleading statements and information as to the results of treatment and Electrodagnostic Testing, as well as the diagnosis, for alleged injury.</p> <p>4. False and misleading test results for Electrodagnostic Testing, which was of no diagnostic value.</p> <p>5. On information and belief, Electrodagnostic Testing were never rendered as billed.</p>

PREDICATE ACTS

COVERED PERSON/ CLAIM NUMBER	DOCUMENTS MAILED	MAILED BY	MAILED TO	APPROX. DATE OF MAILING	MISREPRESENTATIONS INCLUDE
Y.L. 0156307209-01	NF-3 bill for EMGs, NCVs, and F wave study, for date of service 1/22/2010, with attached reports and assignment of benefits.	Nara Rehab Medical, P.C.	Allstate	1/27/2010	<p>1. Services provided as part of pattern of fraudulent treatment protocol and unnecessary/improper services.</p> <p>2. False and misleading statements and information that intentionally concealed the fact that the Electrodiagnostic Testing was medically unnecessary.</p> <p>3. False and misleading statements and information as to the results of treatment and Electrodiagnostic Testing, as well as the diagnosis, for alleged injury.</p> <p>4. False and misleading test results for Electrodiagnostic Testing, which was of no diagnostic value.</p> <p>5. On information and belief, Electrodiagnostic Testing were never rendered as billed.</p>

PREDICATE ACTS

COVERED PERSON/ CLAIM NUMBER	DOCUMENTS MAILED	MAILED BY	MAILED TO	APPROX. DATE OF MAILING	MISREPRESENTATIONS INCLUDE
K.S.K. 0156248270-03	NF-3 bill for EMGs, NCVs, and F wave study, for date of service 2/9/2010, with attached reports and assignment of benefits.	Nara Rehab Medical, P.C.	Allstate	2/15/2010	<p>1. Services provided as part of pattern of fraudulent treatment protocol and unnecessary/improper services.</p> <p>2. False and misleading statements and information that intentionally concealed the fact that the Electrodagnostic Testing was medically unnecessary.</p> <p>3. False and misleading statements and information as to the results of treatment and Electrodagnostic Testing, as well as the diagnosis, for alleged injury.</p> <p>4. False and misleading test results for Electrodagnostic Testing, which was of no diagnostic value.</p> <p>5. On information and belief, Electrodagnostic Testing were never rendered as billed.</p>

PREDICATE ACTS

COVERED PERSON/ CLAIM NUMBER	DOCUMENTS MAILED	MAILED BY	MAILED TO	APPROX. DATE OF MAILING	MISREPRESENTATIONS INCLUDE
P.K. 0154524623-06	NF-3 bill for EMGs, NCVs, and F wave study, for date of service 1/14/2010, with attached reports and assignment of benefits.	Nara Rehab Medical, P.C.	Allstate	1/15/2010	<p>1. Services provided as part of pattern of fraudulent treatment protocol and unnecessary/improper services.</p> <p>2. False and misleading statements and information that intentionally concealed the fact that the Electrodagnostic Testing was medically unnecessary.</p> <p>3. False and misleading statements and information as to the results of treatment and Electrodagnostic Testing, as well as the diagnosis, for alleged injury.</p> <p>4. False and misleading test results for Electrodagnostic Testing, which was of no diagnostic value.</p> <p>5. On information and belief, Electrodagnostic Testing were never rendered as billed.</p>

PREDICATE ACTS

COVERED PERSON/ CLAIM NUMBER	DOCUMENTS MAILED	MAILED BY	MAILED TO	APPROX. DATE OF MAILING	MISREPRESENTATIONS INCLUDE
Y.J. 0147773923-01	NF-3 bill for EMGs, NCVs, and F wave study, for date of service 11/3/2009, with attached reports and assignment of benefits.	Nara Rehab Medical, P.C.	Allstate	11/6/2009	<p>1. Services provided as part of pattern of fraudulent treatment protocol and unnecessary/improper services.</p> <p>2. False and misleading statements and information that intentionally concealed the fact that the Electrodagnostic Testing was medically unnecessary.</p> <p>3. False and misleading statements and information as to the results of treatment and Electrodagnostic Testing, as well as the diagnosis, for alleged injury.</p> <p>4. False and misleading test results for Electrodagnostic Testing, which was of no diagnostic value.</p> <p>5. On information and belief, Electrodagnostic Testing were never rendered as billed.</p>

PREDICATE ACTS

COVERED PERSON/ CLAIM NUMBER	DOCUMENTS MAILED	MAILED BY	MAILED TO	APPROX. DATE OF MAILING	MISREPRESENTATIONS INCLUDE
C.C. 0146684113-01	NF-3 bill for EMGs, NCVs, and F wave study, for date of service 10/8/2009, with attached reports and assignment of benefits.	Nara Rehab Medical, P.C.	Allstate	10/16/2009	<p>1. Services provided as part of pattern of fraudulent treatment protocol and unnecessary/improper services.</p> <p>2. False and misleading statements and information that intentionally concealed the fact that the Electrodagnostic Testing was medically unnecessary.</p> <p>3. False and misleading statements and information as to the results of treatment and Electrodagnostic Testing, as well as the diagnosis, for alleged injury.</p> <p>4. False and misleading test results for Electrodagnostic Testing, which was of no diagnostic value.</p> <p>5. On information and belief, Electrodagnostic Testing were never rendered as billed.</p>

EXHIBIT A

Representative sample of claims Allstate paid for Electrodiagnostic Testing that was not performed as billed,
 fabricated and/or of no diagnostic value

Pat. ID	Claimant Initials	Claim#	Date Of Service	Count Of Studies	Electro Diagnostic Study
9468	C.C.	0146684113-01	10/8/2009	1	Upper
9468	C.C.	0146684113-01	10/8/2009	1	Lower
9469	K.C.	4816805834-01	3/14/2008	1	Upper
9469	K.C.	4816805834-01	3/14/2008	1	Lower
9470	H.C.	0183619808-01	1/10/2011	1	Upper
9470	H.C.	0183619808-01	1/10/2011	1	Lower
9471	J.C.	0111635298-01	8/1/2008	1	Upper
9471	J.C.	0111635298-01	8/1/2008	1	Lower
9472	K.C.	0128869260-02	4/8/2009	1	Upper
9472	K.C.	0128869260-02	4/8/2009	1	Lower
9473	M.C.	0137926176-08	7/22/2009	1	Upper
9473	M.C.	0137926176-08	7/22/2009	1	Lower
9474	C.H.	0168897105-02	7/16/2010	1	Upper
9474	C.H.	0168897105-02	7/16/2010	1	Lower
9475	B.H.	2127070072-03	9/18/2008	1	Upper
9475	B.H.	2127070072-03	9/18/2008	1	Lower
9476	J.H.	0114035958-04	9/23/2008	1	Upper
9476	J.H.	0114035958-04	9/23/2008	1	Lower
9477	Y.J.	0147773923-01	11/3/2009	1	Upper
9477	Y.J.	0147773923-01	11/3/2009	1	Lower
9478	B.J.	0116333501-01	12/11/2008	1	Upper
9478	B.J.	0116333501-01	12/11/2008	1	Lower
9479	K.K.	0156248270-03	2/9/2010	1	Upper
9479	K.K.	0156248270-03	2/9/2010	1	Lower
9480	M.K.	0115716797-01	10/28/2008	1	Upper
9480	M.K.	0115716797-01	10/28/2008	1	Lower
9481	S.K.	4145339828-14	1/28/2008	1	Upper
9481	S.K.	4145339828-14	1/28/2008	1	Lower
9482	C.K.	0181491457-01	12/28/2010	1	Upper
9482	C.K.	0181491457-01	12/28/2010	1	Lower
9483	C.K.	0127569549-01	3/25/2009	1	Upper
9483	C.K.	0127569549-01	3/25/2009	1	Lower
9484	E.K.	0131998725-01	5/5/2009	1	Upper
9484	E.K.	0131998725-01	5/5/2009	1	Lower
9485	H.K.	0165932211-01	6/23/2010	1	Upper
9485	H.K.	0165932211-01	6/23/2010	1	Lower
9486	H.K.	0170751432-12	8/20/2010	1	Upper
9486	H.K.	0170751432-12	8/20/2010	1	Lower
9487	J.K.	0188935175-01	3/4/2011	1	Upper
9487	J.K.	0188935175-01	3/4/2011	1	Lower
9488	J.K.	0117982958-01	10/17/2008	1	Upper
9488	J.K.	0117982958-01	10/17/2008	1	Lower

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Representative sample of claims Allstate paid for Electrodiagnostic Testing that was not performed as billed, fabricated and/or of no diagnostic value

Pat. ID	Claimant Initials	Claim#	Date Of Service	Count Of Studies	Electro Diagnostic Study
9489	S.K.	0166546341-03	7/15/2010	1	Upper
9489	S.K.	0166546341-03	7/15/2010	1	Lower
9490	S.K.	0119352714-06	11/17/2008	1	Upper
9490	S.K.	0119352714-06	11/17/2008	1	Lower
9491	T.K.	0136601713-05	8/5/2009	1	Upper
9491	T.K.	0136601713-05	8/5/2009	1	Lower
9492	U.K.	0127824027-01	3/30/2009	1	Upper
9492	U.K.	0127824027-01	3/30/2009	1	Lower
9493	Y.K.	4145820454-02	4/4/2011	1	Upper
9494	C.K.	0132074055-02	5/27/2009	1	Upper
9494	C.K.	0132074055-02	5/27/2009	1	Lower
9495	Y.K.	0123225542-03	1/22/2009	1	Upper
9495	Y.K.	0123225542-03	1/22/2009	1	Lower
9496	A.K.	0157110636-03	2/17/2010	1	Upper
9496	A.K.	0157110636-03	2/17/2010	1	Lower
9497	J.L.	0184444727-01	1/28/2011	1	Upper
9497	J.L.	0184444727-01	1/28/2011	1	Lower
9498	J.L.	0145369112-01	10/12/2009	1	Upper
9498	J.L.	0145369112-01	10/12/2009	1	Lower
9499	J.L.	0162605380-04	5/24/2010	1	Upper
9499	J.L.	0162605380-04	5/24/2010	1	Lower
9500	K.L.	4145674869-02	2/3/2010	1	Upper
9500	K.L.	4145674869-02	2/3/2010	1	Lower
9501	S.L.	4145384535-01	3/7/2008	1	Upper
9501	S.L.	4145384535-01	3/7/2008	1	Lower
9502	Y.L.	0156307209-01	1/22/2010	1	Upper
9502	Y.L.	0156307209-01	1/22/2010	1	Lower
9503	D.M.	4145065282-02	6/28/2007	1	Upper
9503	D.M.	4145065282-02	7/12/2007	1	Lower
9504	M.P.	0178083267-01	11/2/2010	1	Upper
9504	M.P.	0178083267-01	11/2/2010	1	Lower
9505	H.P.	2126959465-03	3/28/2008	1	Upper
9505	H.P.	2126959465-03	3/28/2008	1	Lower
9506	M.P.	0143863009-02	9/14/2009	1	Upper
9506	M.P.	0143863009-02	9/14/2009	1	Lower
9507	C.P.	0154524623-06	1/14/2010	1	Upper
9507	C.P.	0154524623-06	1/14/2010	1	Lower
9508	D.R.	0112462882-01	8/27/2008	1	Upper
9508	D.R.	0112462882-01	8/27/2008	1	Lower
9509	R.S.	4145512796-02	1/15/2009	1	Upper
9509	R.S.	4145512796-02	1/15/2009	1	Lower
9510	E.S.	0127955334-10	4/6/2009	1	Upper

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Representative sample of claims Allstate paid for Electrodiagnostic Testing that was not performed as billed,
fabricated and/or of no diagnostic value

Pat. ID	Claimant Initials	Claim#	Date Of Service	Count Of Studies	Electro Diagnostic Study
9510	E.S.	0127955334-10	4/6/2009	1	Lower
9511	K.S.	0144554847-05	10/7/2009	1	Upper
9511	K.S.	0144554847-05	10/7/2009	1	Lower
9512	M.S.	0173331983-04	9/3/2010	1	Upper
9512	M.S.	0173331983-04	9/3/2010	1	Lower
9513	Y.Y.	4145436244-01	7/8/2008	1	Upper
9513	Y.Y.	4145436244-01	7/8/2008	1	Lower
9514	D.Y.	0112214069-07	9/26/2008	1	Upper
9514	D.Y.	0112214069-07	9/26/2008	1	Lower

EXHIBIT B

Pat. ID	Claimant Initials	Claim#	Date Of Service	EXCESS NCS
9468	C.C.	0146684113-01	10/8/2009	1
9468	C.C.	0146684113-01	10/8/2009	1
9469	K.C.	4816805834-01	3/14/2008	1
9469	K.C.	4816805834-01	3/14/2008	1
9470	H.C.	0183619808-01	1/10/2011	1
9470	H.C.	0183619808-01	1/10/2011	1
9471	J.C.	0111635298-01	8/1/2008	1
9471	J.C.	0111635298-01	8/1/2008	1
9472	K.C.	0128869260-02	4/8/2009	1
9472	K.C.	0128869260-02	4/8/2009	1
9473	M.C.	0137926176-08	7/22/2009	1
9473	M.C.	0137926176-08	7/22/2009	1
9474	C.H.	0168897105-02	7/16/2010	
9474	C.H.	0168897105-02	7/16/2010	1
9475	B.H.	2127070072-03	9/18/2008	
9475	B.H.	2127070072-03	9/18/2008	1
9476	J.H.	0114035958-04	9/23/2008	1
9476	J.H.	0114035958-04	9/23/2008	1
9477	Y.J.	0147773923-01	11/3/2009	
9477	Y.J.	0147773923-01	11/3/2009	1
9478	B.J.	0116333501-01	12/11/2008	1
9478	B.J.	0116333501-01	12/11/2008	1
9479	K.K.	0156248270-03	2/9/2010	1
9479	K.K.	0156248270-03	2/9/2010	1
9480	M.K.	0115716797-01	10/28/2008	1
9480	M.K.	0115716797-01	10/28/2008	1
9481	S.K.	4145339828-14	1/28/2008	1
9481	S.K.	4145339828-14	1/28/2008	1
9482	C.K.	0181491457-01	12/28/2010	1
9482	C.K.	0181491457-01	12/28/2010	1
9483	C.K.	0127569549-01	3/25/2009	1
9483	C.K.	0127569549-01	3/25/2009	1
9484	E.K.	0131998725-01	5/5/2009	1
9484	E.K.	0131998725-01	5/5/2009	1
9485	H.K.	0165932211-01	6/23/2010	1
9485	H.K.	0165932211-01	6/23/2010	1
9486	H.K.	0170751432-12	8/20/2010	
9486	H.K.	0170751432-12	8/20/2010	
9487	J.K.	0188935175-01	3/4/2011	1
9487	J.K.	0188935175-01	3/4/2011	1
9488	J.K.	0117982958-01	10/17/2008	1
9488	J.K.	0117982958-01	10/17/2008	1
9489	S.K.	0166546341-03	7/15/2010	1

Allstate Ins. Co. v. Nara Rehab et al.

Representative sample of NCVs that were overutilized

Pat. ID	Claimant Initials	Claim#	Date Of Service	EXCESS NCS
9489	S.K.	0166546341-03	7/15/2010	1
9490	S.K.	0119352714-06	11/17/2008	1
9490	S.K.	0119352714-06	11/17/2008	1
9491	T.K.	0136601713-05	8/5/2009	1
9491	T.K.	0136601713-05	8/5/2009	1
9492	U.K.	0127824027-01	3/30/2009	1
9492	U.K.	0127824027-01	3/30/2009	1
9493	Y.K.	4145820454-02	4/4/2011	1
9494	C.K.	0132074055-02	5/27/2009	
9494	C.K.	0132074055-02	5/27/2009	1
9495	Y.K.	0123225542-03	1/22/2009	1
9495	Y.K.	0123225542-03	1/22/2009	1
9496	A.K.	0157110636-03	2/17/2010	1
9496	A.K.	0157110636-03	2/17/2010	1
9497	J.L.	0184444727-01	1/28/2011	1
9497	J.L.	0184444727-01	1/28/2011	1
9498	J.L.	0145369112-01	10/12/2009	1
9498	J.L.	0145369112-01	10/12/2009	1
9499	J.L.	0162605380-04	5/24/2010	1
9499	J.L.	0162605380-04	5/24/2010	1
9500	K.L.	4145674869-02	2/3/2010	1
9500	K.L.	4145674869-02	2/3/2010	1
9501	S.L.	4145384535-01	3/7/2008	1
9501	S.L.	4145384535-01	3/7/2008	1
9502	Y.L.	0156307209-01	1/22/2010	1
9502	Y.L.	0156307209-01	1/22/2010	1
9503	D.M.	4145065282-02	6/28/2007	1
9503	D.M.	4145065282-02	7/12/2007	1
9504	M.P.	0178083267-01	11/2/2010	1
9504	M.P.	0178083267-01	11/2/2010	1
9505	H.P.	2126959465-03	3/28/2008	1
9505	H.P.	2126959465-03	3/28/2008	1
9506	M.P.	0143863009-02	9/14/2009	
9506	M.P.	0143863009-02	9/14/2009	1
9507	C.P.	0154524623-06	1/14/2010	
9507	C.P.	0154524623-06	1/14/2010	1
9508	D.R.	0112462882-01	8/27/2008	1
9508	D.R.	0112462882-01	8/27/2008	1
9509	R.S.	4145512796-02	1/15/2009	1
9509	R.S.	4145512796-02	1/15/2009	1
9510	E.S.	0127955334-10	4/6/2009	1
9510	E.S.	0127955334-10	4/6/2009	1

Allstate Ins. Co. v. Nara Rehab et al.**Representative sample of NCVs that were overutilized**

Pat. ID	Claimant Initials	Claim#	Date Of Service	EXCESS NCS
9511	K.S.	0144554847-05	10/7/2009	1
9511	K.S.	0144554847-05	10/7/2009	1
9512	M.S.	0173331983-04	9/3/2010	1
9512	M.S.	0173331983-04	9/3/2010	1
9513	Y.Y.	4145436244-01	7/8/2008	1
9513	Y.Y.	4145436244-01	7/8/2008	1
9514	D.Y.	0112214069-07	9/26/2008	1
9514	D.Y.	0112214069-07	9/26/2008	1

EXHIBIT C

Representative sample of NCV studies in which a conduction block was present but failed to be noted

Pat. ID	Claimant Initials	Claim#	Date Of Service	COND BLOCK	# COND BLOCKS
9468	C.C.	0146684113-01	10/8/2009		
9468	C.C.	0146684113-01	10/8/2009	1	2
9469	K.C.	4816805834-01	3/14/2008		
9469	K.C.	4816805834-01	3/14/2008	1	2
9470	H.C.	0183619808-01	1/10/2011	1	1
9470	H.C.	0183619808-01	1/10/2011	1	2
9471	J.C.	0111635298-01	8/1/2008	1	1
9471	J.C.	0111635298-01	8/1/2008	1	2
9472	K.C.	0128869260-02	4/8/2009	1	1
9472	K.C.	0128869260-02	4/8/2009	1	2
9473	M.C.	0137926176-08	7/22/2009	1	2
9473	M.C.	0137926176-08	7/22/2009	1	1
9474	C.H.	0168897105-02	7/16/2010		
9474	C.H.	0168897105-02	7/16/2010	1	3
9475	B.H.	2127070072-03	9/18/2008		
9475	B.H.	2127070072-03	9/18/2008	1	4
9476	J.H.	0114035958-04	9/23/2008		
9476	J.H.	0114035958-04	9/23/2008	1	3
9477	Y.J.	0147773923-01	11/3/2009		
9477	Y.J.	0147773923-01	11/3/2009	1	3
9478	B.J.	0116333501-01	12/11/2008		
9478	B.J.	0116333501-01	12/11/2008	1	2
9479	K.K.	0156248270-03	2/9/2010		
9479	K.K.	0156248270-03	2/9/2010	1	3
9480	M.K.	0115716797-01	10/28/2008		
9480	M.K.	0115716797-01	10/28/2008	1	2
9481	S.K.	4145339828-14	1/28/2008	1	1
9481	S.K.	4145339828-14	1/28/2008	1	3
9482	C.K.	0181491457-01	12/28/2010		
9482	C.K.	0181491457-01	12/28/2010	1	2
9483	C.K.	0127569549-01	3/25/2009		
9483	C.K.	0127569549-01	3/25/2009	1	4
9484	E.K.	0131998725-01	5/5/2009	1	1
9484	E.K.	0131998725-01	5/5/2009	1	2
9485	H.K.	0165932211-01	6/23/2010		
9485	H.K.	0165932211-01	6/23/2010	1	4
9486	H.K.	0170751432-12	8/20/2010		
9486	H.K.	0170751432-12	8/20/2010		
9487	J.K.	0188935175-01	3/4/2011		
9487	J.K.	0188935175-01	3/4/2011	1	2
9488	J.K.	0117982958-01	10/17/2008		
9488	J.K.	0117982958-01	10/17/2008	1	3
9489	S.K.	0166546341-03	7/15/2010		

Representative sample of NCV studies in which a conduction block was present but failed to be noted

Pat. ID	Claimant Initials	Claim#	Date Of Service	COND BLOCK	# COND BLOCKS
9489	S.K.	0166546341-03	7/15/2010	1	3
9490	S.K.	0119352714-06	11/17/2008		
9490	S.K.	0119352714-06	11/17/2008	1	2
9491	T.K.	0136601713-05	8/5/2009		
9491	T.K.	0136601713-05	8/5/2009	1	2
9492	U.K.	0127824027-01	3/30/2009		
9492	U.K.	0127824027-01	3/30/2009	1	2
9493	Y.K.	4145820454-02	4/4/2011		
9494	C.K.	0132074055-02	5/27/2009		
9494	C.K.	0132074055-02	5/27/2009	1	2
9495	Y.K.	0123225542-03	1/22/2009		
9495	Y.K.	0123225542-03	1/22/2009	1	3
9496	A.K.	0157110636-03	2/17/2010		
9496	A.K.	0157110636-03	2/17/2010	1	2
9497	J.L.	0184444727-01	1/28/2011		
9497	J.L.	0184444727-01	1/28/2011	1	2
9498	J.L.	0145369112-01	10/12/2009	1	2
9498	J.L.	0145369112-01	10/12/2009	1	3
9499	J.L.	0162605380-04	5/24/2010		
9499	J.L.	0162605380-04	5/24/2010	1	2
9500	K.L.	4145674869-02	2/3/2010		
9500	K.L.	4145674869-02	2/3/2010	1	3
9501	S.L.	4145384535-01	3/7/2008	1	1
9501	S.L.	4145384535-01	3/7/2008	1	2
9502	Y.L.	0156307209-01	1/22/2010		
9502	Y.L.	0156307209-01	1/22/2010	1	2
9503	D.M.	4145065282-02	6/28/2007		
9503	D.M.	4145065282-02	7/12/2007	1	2
9504	M.P.	0178083267-01	11/2/2010	1	1
9504	M.P.	0178083267-01	11/2/2010	1	2
9505	H.P.	2126959465-03	3/28/2008	1	1
9505	H.P.	2126959465-03	3/28/2008	1	3
9506	M.P.	0143863009-02	9/14/2009		
9506	M.P.	0143863009-02	9/14/2009	1	2
9507	C.P.	0154524623-06	1/14/2010		
9507	C.P.	0154524623-06	1/14/2010	1	2
9508	D.R.	0112462882-01	8/27/2008	1	2
9508	D.R.	0112462882-01	8/27/2008	1	3
9509	R.S.	4145512796-02	1/15/2009	1	1
9509	R.S.	4145512796-02	1/15/2009	1	2
9510	E.S.	0127955334-10	4/6/2009		
9510	E.S.	0127955334-10	4/6/2009	1	4

Representative sample of NCV studies in which a conduction block was present but failed to be noted

Pat. ID	Claimant Initials	Claim#	Date Of Service	COND BLOCK	# COND BLOCKS
9511	K.S.	0144554847-05	10/7/2009		
9511	K.S.	0144554847-05	10/7/2009	1	2
9512	M.S.	0173331983-04	9/3/2010	1	1
9512	M.S.	0173331983-04	9/3/2010	1	2
9513	Y.Y.	4145436244-01	7/8/2008	1	1
9513	Y.Y.	4145436244-01	7/8/2008	1	4
9514	D.Y.	0112214069-07	9/26/2008		
9514	D.Y.	0112214069-07	9/26/2008	1	2

EXHIBIT D

Representative sample of NCV studies which contain impossible amplitude findings

Pat. ID	Claimant Initials	Claim#	Date Of Service	AMP>PROX
9468	C.C.	0146684113-01	10/8/2009	
9468	C.C.	0146684113-01	10/8/2009	1
9469	K.C.	4816805834-01	3/14/2008	
9469	K.C.	4816805834-01	3/14/2008	
9470	H.C.	0183619808-01	1/10/2011	
9470	H.C.	0183619808-01	1/10/2011	
9471	J.C.	0111635298-01	8/1/2008	
9471	J.C.	0111635298-01	8/1/2008	
9472	K.C.	0128869260-02	4/8/2009	
9472	K.C.	0128869260-02	4/8/2009	
9473	M.C.	0137926176-08	7/22/2009	
9473	M.C.	0137926176-08	7/22/2009	1
9474	C.H.	0168897105-02	7/16/2010	
9474	C.H.	0168897105-02	7/16/2010	
9475	B.H.	2127070072-03	9/18/2008	
9475	B.H.	2127070072-03	9/18/2008	
9476	J.H.	0114035958-04	9/23/2008	
9476	J.H.	0114035958-04	9/23/2008	
9477	Y.J.	0147773923-01	11/3/2009	
9477	Y.J.	0147773923-01	11/3/2009	1
9478	B.J.	0116333501-01	12/11/2008	
9478	B.J.	0116333501-01	12/11/2008	
9479	K.K.	0156248270-03	2/9/2010	1
9479	K.K.	0156248270-03	2/9/2010	
9480	M.K.	0115716797-01	10/28/2008	
9480	M.K.	0115716797-01	10/28/2008	1
9481	S.K.	4145339828-14	1/28/2008	
9481	S.K.	4145339828-14	1/28/2008	
9482	C.K.	0181491457-01	12/28/2010	
9482	C.K.	0181491457-01	12/28/2010	
9483	C.K.	0127569549-01	3/25/2009	
9483	C.K.	0127569549-01	3/25/2009	
9484	E.K.	0131998725-01	5/5/2009	
9484	E.K.	0131998725-01	5/5/2009	
9485	H.K.	0165932211-01	6/23/2010	
9485	H.K.	0165932211-01	6/23/2010	
9486	H.K.	0170751432-12	8/20/2010	
9486	H.K.	0170751432-12	8/20/2010	
9487	J.K.	0188935175-01	3/4/2011	
9487	J.K.	0188935175-01	3/4/2011	
9488	J.K.	0117982958-01	10/17/2008	
9488	J.K.	0117982958-01	10/17/2008	
9489	S.K.	0166546341-03	7/15/2010	

Representative sample of NCV studies which contain impossible amplitude findings

Pat. ID	Claimant Initials	Claim#	Date Of Service	AMP>PROX
9489	S.K.	0166546341-03	7/15/2010	
9490	S.K.	0119352714-06	11/17/2008	
9490	S.K.	0119352714-06	11/17/2008	
9491	T.K.	0136601713-05	8/5/2009	
9491	T.K.	0136601713-05	8/5/2009	1
9492	U.K.	0127824027-01	3/30/2009	
9492	U.K.	0127824027-01	3/30/2009	
9493	Y.K.	4145820454-02	4/4/2011	
9494	C.K.	0132074055-02	5/27/2009	1
9494	C.K.	0132074055-02	5/27/2009	1
9495	Y.K.	0123225542-03	1/22/2009	
9495	Y.K.	0123225542-03	1/22/2009	
9496	A.K.	0157110636-03	2/17/2010	
9496	A.K.	0157110636-03	2/17/2010	
9497	J.L.	0184444727-01	1/28/2011	
9497	J.L.	0184444727-01	1/28/2011	
9498	J.L.	0145369112-01	10/12/2009	
9498	J.L.	0145369112-01	10/12/2009	
9499	J.L.	0162605380-04	5/24/2010	
9499	J.L.	0162605380-04	5/24/2010	
9500	K.L.	4145674869-02	2/3/2010	
9500	K.L.	4145674869-02	2/3/2010	
9501	S.L.	4145384535-01	3/7/2008	1
9501	S.L.	4145384535-01	3/7/2008	
9502	Y.L.	0156307209-01	1/22/2010	
9502	Y.L.	0156307209-01	1/22/2010	
9503	D.M.	4145065282-02	6/28/2007	
9503	D.M.	4145065282-02	7/12/2007	
9504	M.P.	0178083267-01	11/2/2010	
9504	M.P.	0178083267-01	11/2/2010	
9505	H.P.	2126959465-03	3/28/2008	
9505	H.P.	2126959465-03	3/28/2008	
9506	M.P.	0143863009-02	9/14/2009	
9506	M.P.	0143863009-02	9/14/2009	1
9507	C.P.	0154524623-06	1/14/2010	1
9507	C.P.	0154524623-06	1/14/2010	1
9508	D.R.	0112462882-01	8/27/2008	
9508	D.R.	0112462882-01	8/27/2008	
9509	R.S.	4145512796-02	1/15/2009	
9509	R.S.	4145512796-02	1/15/2009	
9510	E.S.	0127955334-10	4/6/2009	
9510	E.S.	0127955334-10	4/6/2009	

Representative sample of NCV studies which contain impossible amplitude findings

Pat. ID	Claimant Initials	Claim#	Date Of Service	AMP>PROX
9511	K.S.	0144554847-05	10/7/2009	
9511	K.S.	0144554847-05	10/7/2009	
9512	M.S.	0173331983-04	9/3/2010	
9512	M.S.	0173331983-04	9/3/2010	1
9513	Y.Y.	4145436244-01	7/8/2008	
9513	Y.Y.	4145436244-01	7/8/2008	
9514	D.Y.	0112214069-07	9/26/2008	
9514	D.Y.	0112214069-07	9/26/2008	

EXHIBIT E

Representative sample of Electrodiagnostic studies where the "protocol approach" was used by Nara Rehab

Pat. ID	Claimant Initials	Claim#	Date Of Service	NCS Prot
9468	C.C.	0146684113-01	10/8/2009	1
9468	C.C.	0146684113-01	10/8/2009	1
9469	K.C.	4816805834-01	3/14/2008	1
9469	K.C.	4816805834-01	3/14/2008	1
9470	H.C.	0183619808-01	1/10/2011	1
9470	H.C.	0183619808-01	1/10/2011	1
9471	J.C.	0111635298-01	8/1/2008	1
9471	J.C.	0111635298-01	8/1/2008	1
9472	K.C.	0128869260-02	4/8/2009	1
9472	K.C.	0128869260-02	4/8/2009	1
9473	M.C.	0137926176-08	7/22/2009	1
9473	M.C.	0137926176-08	7/22/2009	1
9474	C.H.	0168897105-02	7/16/2010	1
9474	C.H.	0168897105-02	7/16/2010	1
9475	B.H.	2127070072-03	9/18/2008	1
9475	B.H.	2127070072-03	9/18/2008	1
9476	J.H.	0114035958-04	9/23/2008	1
9476	J.H.	0114035958-04	9/23/2008	1
9477	Y.J.	0147773923-01	11/3/2009	1
9477	Y.J.	0147773923-01	11/3/2009	1
9478	B.J.	0116333501-01	12/11/2008	1
9478	B.J.	0116333501-01	12/11/2008	1
9479	K.K.	0156248270-03	2/9/2010	1
9479	K.K.	0156248270-03	2/9/2010	1
9480	M.K.	0115716797-01	10/28/2008	1
9480	M.K.	0115716797-01	10/28/2008	1
9481	S.K.	4145339828-14	1/28/2008	1
9481	S.K.	4145339828-14	1/28/2008	1
9482	C.K.	0181491457-01	12/28/2010	1
9482	C.K.	0181491457-01	12/28/2010	1
9483	C.K.	0127569549-01	3/25/2009	1
9483	C.K.	0127569549-01	3/25/2009	1
9484	E.K.	0131998725-01	5/5/2009	1
9484	E.K.	0131998725-01	5/5/2009	1
9485	H.K.	0165932211-01	6/23/2010	1
9485	H.K.	0165932211-01	6/23/2010	1
9486	H.K.	0170751432-12	8/20/2010	1
9486	H.K.	0170751432-12	8/20/2010	1
9487	J.K.	0188935175-01	3/4/2011	1
9487	J.K.	0188935175-01	3/4/2011	1
9488	J.K.	0117982958-01	10/17/2008	1
9488	J.K.	0117982958-01	10/17/2008	1
9489	S.K.	0166546341-03	7/15/2010	1

Representative sample of Electrodiagnostic studies where the “protocol approach” was used by Nara Rehab

Pat. ID	Claimant Initials	Claim#	Date Of Service	NCS Prot
9489	S.K.	0166546341-03	7/15/2010	1
9490	S.K.	0119352714-06	11/17/2008	1
9490	S.K.	0119352714-06	11/17/2008	1
9491	T.K.	0136601713-05	8/5/2009	1
9491	T.K.	0136601713-05	8/5/2009	1
9492	U.K.	0127824027-01	3/30/2009	1
9492	U.K.	0127824027-01	3/30/2009	1
9493	Y.K.	4145820454-02	4/4/2011	1
9494	C.K.	0132074055-02	5/27/2009	1
9494	C.K.	0132074055-02	5/27/2009	1
9495	Y.K.	0123225542-03	1/22/2009	1
9495	Y.K.	0123225542-03	1/22/2009	1
9496	A.K.	0157110636-03	2/17/2010	1
9496	A.K.	0157110636-03	2/17/2010	1
9497	J.L.	0184444727-01	1/28/2011	1
9497	J.L.	0184444727-01	1/28/2011	1
9498	J.L.	0145369112-01	10/12/2009	1
9498	J.L.	0145369112-01	10/12/2009	1
9499	J.L.	0162605380-04	5/24/2010	1
9499	J.L.	0162605380-04	5/24/2010	1
9500	K.L.	4145674869-02	2/3/2010	1
9500	K.L.	4145674869-02	2/3/2010	1
9501	S.L.	4145384535-01	3/7/2008	1
9501	S.L.	4145384535-01	3/7/2008	1
9502	Y.L.	0156307209-01	1/22/2010	1
9502	Y.L.	0156307209-01	1/22/2010	1
9503	D.M.	4145065282-02	6/28/2007	1
9503	D.M.	4145065282-02	7/12/2007	1
9504	M.P.	0178083267-01	11/2/2010	1
9504	M.P.	0178083267-01	11/2/2010	1
9505	H.P.	2126959465-03	3/28/2008	1
9505	H.P.	2126959465-03	3/28/2008	1
9506	M.P.	0143863009-02	9/14/2009	1
9506	M.P.	0143863009-02	9/14/2009	1
9507	C.P.	0154524623-06	1/14/2010	1
9507	C.P.	0154524623-06	1/14/2010	1
9508	D.R.	0112462882-01	8/27/2008	1
9508	D.R.	0112462882-01	8/27/2008	1
9509	R.S.	4145512796-02	1/15/2009	1
9509	R.S.	4145512796-02	1/15/2009	1
9510	E.S.	0127955334-10	4/6/2009	1
9510	E.S.	0127955334-10	4/6/2009	1

Representative sample of Electrodiagnostic studies where the “protocol approach” was used by Nara Rehab

Pat. ID	Claimant Initials	Claim#	Date Of Service	NCS Prot
9511	K.S.	0144554847-05	10/7/2009	1
9511	K.S.	0144554847-05	10/7/2009	1
9512	M.S.	0173331983-04	9/3/2010	1
9512	M.S.	0173331983-04	9/3/2010	1
9513	Y.Y.	4145436244-01	7/8/2008	1
9513	Y.Y.	4145436244-01	7/8/2008	1
9514	D.Y.	0112214069-07	9/26/2008	1
9514	D.Y.	0112214069-07	9/26/2008	1

EXHIBIT F

Representative sample of studies in which F-waves were over-utilized

Pat. ID	Claimant Initials	Claim#	Date Of Service	OVER F
9468	C.C.	0146684113-01	10/8/2009	1
9468	C.C.	0146684113-01	10/8/2009	1
9469	K.C.	4816805834-01	3/14/2008	1
9469	K.C.	4816805834-01	3/14/2008	1
9470	H.C.	0183619808-01	1/10/2011	1
9470	H.C.	0183619808-01	1/10/2011	1
9471	J.C.	0111635298-01	8/1/2008	1
9471	J.C.	0111635298-01	8/1/2008	1
9472	K.C.	0128869260-02	4/8/2009	1
9472	K.C.	0128869260-02	4/8/2009	1
9473	M.C.	0137926176-08	7/22/2009	1
9473	M.C.	0137926176-08	7/22/2009	1
9474	C.H.	0168897105-02	7/16/2010	1
9474	C.H.	0168897105-02	7/16/2010	1
9475	B.H.	2127070072-03	9/18/2008	1
9475	B.H.	2127070072-03	9/18/2008	1
9476	J.H.	0114035958-04	9/23/2008	1
9476	J.H.	0114035958-04	9/23/2008	1
9477	Y.J.	0147773923-01	11/3/2009	1
9477	Y.J.	0147773923-01	11/3/2009	1
9478	B.J.	0116333501-01	12/11/2008	1
9478	B.J.	0116333501-01	12/11/2008	1
9479	K.K.	0156248270-03	2/9/2010	1
9479	K.K.	0156248270-03	2/9/2010	1
9480	M.K.	0115716797-01	10/28/2008	1
9480	M.K.	0115716797-01	10/28/2008	1
9481	S.K.	4145339828-14	1/28/2008	1
9481	S.K.	4145339828-14	1/28/2008	1
9482	C.K.	0181491457-01	12/28/2010	1
9482	C.K.	0181491457-01	12/28/2010	1
9483	C.K.	0127569549-01	3/25/2009	1
9483	C.K.	0127569549-01	3/25/2009	1
9484	E.K.	0131998725-01	5/5/2009	1
9484	E.K.	0131998725-01	5/5/2009	1
9485	H.K.	0165932211-01	6/23/2010	1
9485	H.K.	0165932211-01	6/23/2010	1
9486	H.K.	0170751432-12	8/20/2010	
9486	H.K.	0170751432-12	8/20/2010	
9487	J.K.	0188935175-01	3/4/2011	1
9487	J.K.	0188935175-01	3/4/2011	1
9488	J.K.	0117982958-01	10/17/2008	1
9488	J.K.	0117982958-01	10/17/2008	1
9489	S.K.	0166546341-03	7/15/2010	1

Representative sample of studies in which F-waves were over-utilized

Pat. ID	Claimant Initials	Claim#	Date Of Service	OVER F
9489	S.K.	0166546341-03	7/15/2010	1
9490	S.K.	0119352714-06	11/17/2008	1
9490	S.K.	0119352714-06	11/17/2008	1
9491	T.K.	0136601713-05	8/5/2009	1
9491	T.K.	0136601713-05	8/5/2009	1
9492	U.K.	0127824027-01	3/30/2009	1
9492	U.K.	0127824027-01	3/30/2009	1
9493	Y.K.	4145820454-02	4/4/2011	1
9494	C.K.	0132074055-02	5/27/2009	1
9494	C.K.	0132074055-02	5/27/2009	1
9495	Y.K.	0123225542-03	1/22/2009	1
9495	Y.K.	0123225542-03	1/22/2009	1
9496	A.K.	0157110636-03	2/17/2010	1
9496	A.K.	0157110636-03	2/17/2010	1
9497	J.L.	0184444727-01	1/28/2011	1
9497	J.L.	0184444727-01	1/28/2011	1
9498	J.L.	0145369112-01	10/12/2009	1
9498	J.L.	0145369112-01	10/12/2009	1
9499	J.L.	0162605380-04	5/24/2010	1
9499	J.L.	0162605380-04	5/24/2010	1
9500	K.L.	4145674869-02	2/3/2010	1
9500	K.L.	4145674869-02	2/3/2010	1
9501	S.L.	4145384535-01	3/7/2008	1
9501	S.L.	4145384535-01	3/7/2008	1
9502	Y.L.	0156307209-01	1/22/2010	1
9502	Y.L.	0156307209-01	1/22/2010	1
9503	D.M.	4145065282-02	6/28/2007	1
9503	D.M.	4145065282-02	7/12/2007	1
9504	M.P.	0178083267-01	11/2/2010	1
9504	M.P.	0178083267-01	11/2/2010	1
9505	H.P.	2126959465-03	3/28/2008	1
9505	H.P.	2126959465-03	3/28/2008	1
9506	M.P.	0143863009-02	9/14/2009	1
9506	M.P.	0143863009-02	9/14/2009	1
9507	C.P.	0154524623-06	1/14/2010	1
9507	C.P.	0154524623-06	1/14/2010	1
9508	D.R.	0112462882-01	8/27/2008	1
9508	D.R.	0112462882-01	8/27/2008	1
9509	R.S.	4145512796-02	1/15/2009	1
9509	R.S.	4145512796-02	1/15/2009	1
9510	E.S.	0127955334-10	4/6/2009	1
9510	E.S.	0127955334-10	4/6/2009	1

Representative sample of studies in which F-waves were over-utilized

Pat. ID	Claimant Initials	Claim#	Date Of Service	OVER F
9511	K.S.	0144554847-05	10/7/2009	1
9511	K.S.	0144554847-05	10/7/2009	1
9512	M.S.	0173331983-04	9/3/2010	1
9512	M.S.	0173331983-04	9/3/2010	1
9513	Y.Y.	4145436244-01	7/8/2008	1
9513	Y.Y.	4145436244-01	7/8/2008	1
9514	D.Y.	0112214069-07	9/26/2008	1
9514	D.Y.	0112214069-07	9/26/2008	1

EXHIBIT G

Representative sample of studies in which Nara Rehab failed to conduct sufficient stimulations to bill for the service

Pat. ID	Claimant Initials	Claim#	Date Of Service	F# INSUF
9468	C.C.	0146684113-01	10/8/2009	1
9468	C.C.	0146684113-01	10/8/2009	1
9469	K.C.	4816805834-01	3/14/2008	1
9469	K.C.	4816805834-01	3/14/2008	1
9470	H.C.	0183619808-01	1/10/2011	1
9470	H.C.	0183619808-01	1/10/2011	1
9471	J.C.	0111635298-01	8/1/2008	
9471	J.C.	0111635298-01	8/1/2008	
9472	K.C.	0128869260-02	4/8/2009	
9472	K.C.	0128869260-02	4/8/2009	
9473	M.C.	0137926176-08	7/22/2009	1
9473	M.C.	0137926176-08	7/22/2009	1
9474	C.H.	0168897105-02	7/16/2010	1
9474	C.H.	0168897105-02	7/16/2010	1
9475	B.H.	2127070072-03	9/18/2008	1
9475	B.H.	2127070072-03	9/18/2008	1
9476	J.H.	0114035958-04	9/23/2008	1
9476	J.H.	0114035958-04	9/23/2008	1
9477	Y.J.	0147773923-01	11/3/2009	1
9477	Y.J.	0147773923-01	11/3/2009	1
9478	B.J.	0116333501-01	12/11/2008	1
9478	B.J.	0116333501-01	12/11/2008	1
9479	K.K.	0156248270-03	2/9/2010	1
9479	K.K.	0156248270-03	2/9/2010	1
9480	M.K.	0115716797-01	10/28/2008	1
9480	M.K.	0115716797-01	10/28/2008	1
9481	S.K.	4145339828-14	1/28/2008	1
9481	S.K.	4145339828-14	1/28/2008	1
9482	C.K.	0181491457-01	12/28/2010	1
9482	C.K.	0181491457-01	12/28/2010	1
9483	C.K.	0127569549-01	3/25/2009	
9483	C.K.	0127569549-01	3/25/2009	
9484	E.K.	0131998725-01	5/5/2009	
9484	E.K.	0131998725-01	5/5/2009	
9485	H.K.	0165932211-01	6/23/2010	1
9485	H.K.	0165932211-01	6/23/2010	1
9486	H.K.	0170751432-12	8/20/2010	1
9486	H.K.	0170751432-12	8/20/2010	1
9487	J.K.	0188935175-01	3/4/2011	1
9487	J.K.	0188935175-01	3/4/2011	1
9488	J.K.	0117982958-01	10/17/2008	1
9488	J.K.	0117982958-01	10/17/2008	1
9489	S.K.	0166546341-03	7/15/2010	1

Representative sample of studies in which Nara Rehab failed to conduct sufficient stimulations to bill for the service

Pat. ID	Claimant Initials	Claim#	Date Of Service	F# INSUF
9489	S.K.	0166546341-03	7/15/2010	1
9490	S.K.	0119352714-06	11/17/2008	1
9490	S.K.	0119352714-06	11/17/2008	1
9491	T.K.	0136601713-05	8/5/2009	1
9491	T.K.	0136601713-05	8/5/2009	1
9492	U.K.	0127824027-01	3/30/2009	
9492	U.K.	0127824027-01	3/30/2009	
9493	Y.K.	4145820454-02	4/4/2011	1
9494	C.K.	0132074055-02	5/27/2009	1
9494	C.K.	0132074055-02	5/27/2009	1
9495	Y.K.	0123225542-03	1/22/2009	1
9495	Y.K.	0123225542-03	1/22/2009	1
9496	A.K.	0157110636-03	2/17/2010	1
9496	A.K.	0157110636-03	2/17/2010	1
9497	J.L.	0184444727-01	1/28/2011	1
9497	J.L.	0184444727-01	1/28/2011	1
9498	J.L.	0145369112-01	10/12/2009	1
9498	J.L.	0145369112-01	10/12/2009	1
9499	J.L.	0162605380-04	5/24/2010	1
9499	J.L.	0162605380-04	5/24/2010	1
9500	K.L.	4145674869-02	2/3/2010	1
9500	K.L.	4145674869-02	2/3/2010	1
9501	S.L.	4145384535-01	3/7/2008	1
9501	S.L.	4145384535-01	3/7/2008	1
9502	Y.L.	0156307209-01	1/22/2010	1
9502	Y.L.	0156307209-01	1/22/2010	1
9503	D.M.	4145065282-02	6/28/2007	1
9503	D.M.	4145065282-02	7/12/2007	1
9504	M.P.	0178083267-01	11/2/2010	1
9504	M.P.	0178083267-01	11/2/2010	1
9505	H.P.	2126959465-03	3/28/2008	1
9505	H.P.	2126959465-03	3/28/2008	1
9506	M.P.	0143863009-02	9/14/2009	1
9506	M.P.	0143863009-02	9/14/2009	1
9507	C.P.	0154524623-06	1/14/2010	1
9507	C.P.	0154524623-06	1/14/2010	1
9508	D.R.	0112462882-01	8/27/2008	1
9508	D.R.	0112462882-01	8/27/2008	1
9509	R.S.	4145512796-02	1/15/2009	1
9509	R.S.	4145512796-02	1/15/2009	1
9510	E.S.	0127955334-10	4/6/2009	
9510	E.S.	0127955334-10	4/6/2009	

Representative sample of studies in which Nara Rehab failed to conduct sufficient stimulations to bill for the service

Pat. ID	Claimant Initials	Claim#	Date Of Service	F# INSUF
9511	K.S.	0144554847-05	10/7/2009	1
9511	K.S.	0144554847-05	10/7/2009	1
9512	M.S.	0173331983-04	9/3/2010	1
9512	M.S.	0173331983-04	9/3/2010	1
9513	Y.Y.	4145436244-01	7/8/2008	1
9513	Y.Y.	4145436244-01	7/8/2008	1
9514	D.Y.	0112214069-07	9/26/2008	1
9514	D.Y.	0112214069-07	9/26/2008	1

EXHIBIT H

Representative sample of studies in which H-Reflex testing was performed in every lower limb electrodiagnostic study

Pat. ID	Claimant Initials	Claim#	Date Of Service	Lower
9468	C.C.	0146684113-01	10/8/2009	
9468	C.C.	0146684113-01	10/8/2009	1
9469	K.C.	4816805834-01	3/14/2008	
9469	K.C.	4816805834-01	3/14/2008	1
9470	H.C.	0183619808-01	1/10/2011	
9470	H.C.	0183619808-01	1/10/2011	1
9471	J.C.	0111635298-01	8/1/2008	
9471	J.C.	0111635298-01	8/1/2008	1
9472	K.C.	0128869260-02	4/8/2009	
9472	K.C.	0128869260-02	4/8/2009	1
9473	M.C.	0137926176-08	7/22/2009	
9473	M.C.	0137926176-08	7/22/2009	1
9474	C.H.	0168897105-02	7/16/2010	
9474	C.H.	0168897105-02	7/16/2010	1
9475	B.H.	2127070072-03	9/18/2008	
9475	B.H.	2127070072-03	9/18/2008	1
9476	J.H.	0114035958-04	9/23/2008	
9476	J.H.	0114035958-04	9/23/2008	1
9477	Y.J.	0147773923-01	11/3/2009	
9477	Y.J.	0147773923-01	11/3/2009	1
9478	B.J.	0116333501-01	12/11/2008	
9478	B.J.	0116333501-01	12/11/2008	1
9479	K.K.	0156248270-03	2/9/2010	
9479	K.K.	0156248270-03	2/9/2010	1
9480	M.K.	0115716797-01	10/28/2008	
9480	M.K.	0115716797-01	10/28/2008	1
9481	S.K.	4145339828-14	1/28/2008	
9481	S.K.	4145339828-14	1/28/2008	1
9482	C.K.	0181491457-01	12/28/2010	
9482	C.K.	0181491457-01	12/28/2010	1
9483	C.K.	0127569549-01	3/25/2009	
9483	C.K.	0127569549-01	3/25/2009	1
9484	E.K.	0131998725-01	5/5/2009	
9484	E.K.	0131998725-01	5/5/2009	1
9485	H.K.	0165932211-01	6/23/2010	
9485	H.K.	0165932211-01	6/23/2010	1
9486	H.K.	0170751432-12	8/20/2010	
9486	H.K.	0170751432-12	8/20/2010	1
9487	J.K.	0188935175-01	3/4/2011	
9487	J.K.	0188935175-01	3/4/2011	1
9488	J.K.	0117982958-01	10/17/2008	
9488	J.K.	0117982958-01	10/17/2008	1
9489	S.K.	0166546341-03	7/15/2010	

Representative sample of studies in which H-Reflex testing was performed in every lower limb electrodiagnostic study

Pat. ID	Claimant Initials	Claim#	Date Of Service	Lower
9489	S.K.	0166546341-03	7/15/2010	1
9490	S.K.	0119352714-06	11/17/2008	
9490	S.K.	0119352714-06	11/17/2008	1
9491	T.K.	0136601713-05	8/5/2009	
9491	T.K.	0136601713-05	8/5/2009	1
9492	U.K.	0127824027-01	3/30/2009	
9492	U.K.	0127824027-01	3/30/2009	1
9493	Y.K.	4145820454-02	4/4/2011	
9494	C.K.	0132074055-02	5/27/2009	
9494	C.K.	0132074055-02	5/27/2009	1
9495	Y.K.	0123225542-03	1/22/2009	
9495	Y.K.	0123225542-03	1/22/2009	1
9496	A.K.	0157110636-03	2/17/2010	
9496	A.K.	0157110636-03	2/17/2010	1
9497	J.L.	0184444727-01	1/28/2011	
9497	J.L.	0184444727-01	1/28/2011	1
9498	J.L.	0145369112-01	10/12/2009	
9498	J.L.	0145369112-01	10/12/2009	1
9499	J.L.	0162605380-04	5/24/2010	
9499	J.L.	0162605380-04	5/24/2010	1
9500	K.L.	4145674869-02	2/3/2010	
9500	K.L.	4145674869-02	2/3/2010	1
9501	S.L.	4145384535-01	3/7/2008	
9501	S.L.	4145384535-01	3/7/2008	1
9502	Y.L.	0156307209-01	1/22/2010	
9502	Y.L.	0156307209-01	1/22/2010	1
9503	D.M.	4145065282-02	6/28/2007	
9503	D.M.	4145065282-02	7/12/2007	1
9504	M.P.	0178083267-01	11/2/2010	
9504	M.P.	0178083267-01	11/2/2010	1
9505	H.P.	2126959465-03	3/28/2008	
9505	H.P.	2126959465-03	3/28/2008	1
9506	M.P.	0143863009-02	9/14/2009	
9506	M.P.	0143863009-02	9/14/2009	1
9507	C.P.	0154524623-06	1/14/2010	
9507	C.P.	0154524623-06	1/14/2010	1
9508	D.R.	0112462882-01	8/27/2008	
9508	D.R.	0112462882-01	8/27/2008	1
9509	R.S.	4145512796-02	1/15/2009	
9509	R.S.	4145512796-02	1/15/2009	1
9510	E.S.	0127955334-10	4/6/2009	
9510	E.S.	0127955334-10	4/6/2009	1

Representative sample of studies in which H-Reflex testing was performed in every lower limb electrodiagnostic study

Pat. ID	Claimant Initials	Claim#	Date Of Service	Lower
9511	K.S.	0144554847-05	10/7/2009	
9511	K.S.	0144554847-05	10/7/2009	1
9512	M.S.	0173331983-04	9/3/2010	
9512	M.S.	0173331983-04	9/3/2010	1
9513	Y.Y.	4145436244-01	7/8/2008	
9513	Y.Y.	4145436244-01	7/8/2008	1
9514	D.Y.	0112214069-07	9/26/2008	
9514	D.Y.	0112214069-07	9/26/2008	1

EXHIBIT I

Representative sample of NCV studies containing abnormal parameters

Pat. ID	Claimant Initials	Claim#	Date Of Service	ABNOR PARAM
9468	C.C.	0146684113-01	10/8/2009	1
9468	C.C.	0146684113-01	10/8/2009	
9469	K.C.	4816805834-01	3/14/2008	1
9469	K.C.	4816805834-01	3/14/2008	
9470	H.C.	0183619808-01	1/10/2011	
9470	H.C.	0183619808-01	1/10/2011	
9471	J.C.	0111635298-01	8/1/2008	1
9471	J.C.	0111635298-01	8/1/2008	
9472	K.C.	0128869260-02	4/8/2009	1
9472	K.C.	0128869260-02	4/8/2009	
9473	M.C.	0137926176-08	7/22/2009	1
9473	M.C.	0137926176-08	7/22/2009	
9474	C.H.	0168897105-02	7/16/2010	
9474	C.H.	0168897105-02	7/16/2010	
9475	B.H.	2127070072-03	9/18/2008	
9475	B.H.	2127070072-03	9/18/2008	
9476	J.H.	0114035958-04	9/23/2008	
9476	J.H.	0114035958-04	9/23/2008	
9477	Y.J.	0147773923-01	11/3/2009	
9477	Y.J.	0147773923-01	11/3/2009	
9478	B.J.	0116333501-01	12/11/2008	
9478	B.J.	0116333501-01	12/11/2008	
9479	K.K.	0156248270-03	2/9/2010	
9479	K.K.	0156248270-03	2/9/2010	
9480	M.K.	0115716797-01	10/28/2008	1
9480	M.K.	0115716797-01	10/28/2008	
9481	S.K.	4145339828-14	1/28/2008	1
9481	S.K.	4145339828-14	1/28/2008	
9482	C.K.	0181491457-01	12/28/2010	1
9482	C.K.	0181491457-01	12/28/2010	
9483	C.K.	0127569549-01	3/25/2009	
9483	C.K.	0127569549-01	3/25/2009	
9484	E.K.	0131998725-01	5/5/2009	
9484	E.K.	0131998725-01	5/5/2009	
9485	H.K.	0165932211-01	6/23/2010	1
9485	H.K.	0165932211-01	6/23/2010	
9486	H.K.	0170751432-12	8/20/2010	
9486	H.K.	0170751432-12	8/20/2010	
9487	J.K.	0188935175-01	3/4/2011	1
9487	J.K.	0188935175-01	3/4/2011	
9488	J.K.	0117982958-01	10/17/2008	1
9488	J.K.	0117982958-01	10/17/2008	

Representative sample of NCV studies containing abnormal parameters

Pat. ID	Claimant Initials	Claim#	Date Of Service	ABNOR PARAM
9489	S.K.	0166546341-03	7/15/2010	
9489	S.K.	0166546341-03	7/15/2010	
9490	S.K.	0119352714-06	11/17/2008	
9490	S.K.	0119352714-06	11/17/2008	
9491	T.K.	0136601713-05	8/5/2009	1
9491	T.K.	0136601713-05	8/5/2009	
9492	U.K.	0127824027-01	3/30/2009	1
9492	U.K.	0127824027-01	3/30/2009	
9493	Y.K.	4145820454-02	4/4/2011	
9494	C.K.	0132074055-02	5/27/2009	
9494	C.K.	0132074055-02	5/27/2009	
9495	Y.K.	0123225542-03	1/22/2009	1
9495	Y.K.	0123225542-03	1/22/2009	
9496	A.K.	0157110636-03	2/17/2010	
9496	A.K.	0157110636-03	2/17/2010	
9497	J.L.	0184444727-01	1/28/2011	
9497	J.L.	0184444727-01	1/28/2011	
9498	J.L.	0145369112-01	10/12/2009	1
9498	J.L.	0145369112-01	10/12/2009	
9499	J.L.	0162605380-04	5/24/2010	
9499	J.L.	0162605380-04	5/24/2010	
9500	K.L.	4145674869-02	2/3/2010	1
9500	K.L.	4145674869-02	2/3/2010	
9501	S.L.	4145384535-01	3/7/2008	1
9501	S.L.	4145384535-01	3/7/2008	
9502	Y.L.	0156307209-01	1/22/2010	
9502	Y.L.	0156307209-01	1/22/2010	
9503	D.M.	4145065282-02	6/28/2007	1
9503	D.M.	4145065282-02	7/12/2007	
9504	M.P.	0178083267-01	11/2/2010	1
9504	M.P.	0178083267-01	11/2/2010	
9505	H.P.	2126959465-03	3/28/2008	1
9505	H.P.	2126959465-03	3/28/2008	
9506	M.P.	0143863009-02	9/14/2009	
9506	M.P.	0143863009-02	9/14/2009	
9507	C.P.	0154524623-06	1/14/2010	1
9507	C.P.	0154524623-06	1/14/2010	
9508	D.R.	0112462882-01	8/27/2008	1
9508	D.R.	0112462882-01	8/27/2008	
9509	R.S.	4145512796-02	1/15/2009	1
9509	R.S.	4145512796-02	1/15/2009	
9510	E.S.	0127955334-10	4/6/2009	

Representative sample of NCV studies containing abnormal parameters

Pat. ID	Claimant Initials	Claim#	Date Of Service	ABNOR PARAM
9510	E.S.	0127955334-10	4/6/2009	
9511	K.S.	0144554847-05	10/7/2009	
9511	K.S.	0144554847-05	10/7/2009	
9512	M.S.	0173331983-04	9/3/2010	1
9512	M.S.	0173331983-04	9/3/2010	
9513	Y.Y.	4145436244-01	7/8/2008	1
9513	Y.Y.	4145436244-01	7/8/2008	
9514	D.Y.	0112214069-07	9/26/2008	1
9514	D.Y.	0112214069-07	9/26/2008	

EXHIBIT J

Representative sample of studies where Mun diagnosed cervical radiculopathy and lumbosacral radiculopathy

Pat. ID	Claimant Initials	Claim#	Date Of Service	Radic By Patient
9468	C.C.	0146684113-01	10/8/2009	
9468	C.C.	0146684113-01	10/8/2009	1
9469	K.C.	4816805834-01	3/14/2008	1
9469	K.C.	4816805834-01	3/14/2008	
9470	H.C.	0183619808-01	1/10/2011	
9470	H.C.	0183619808-01	1/10/2011	1
9471	J.C.	0111635298-01	8/1/2008	1
9471	J.C.	0111635298-01	8/1/2008	
9472	K.C.	0128869260-02	4/8/2009	
9472	K.C.	0128869260-02	4/8/2009	1
9473	M.C.	0137926176-08	7/22/2009	
9473	M.C.	0137926176-08	7/22/2009	
9474	C.H.	0168897105-02	7/16/2010	
9474	C.H.	0168897105-02	7/16/2010	
9475	B.H.	2127070072-03	9/18/2008	1
9475	B.H.	2127070072-03	9/18/2008	
9476	J.H.	0114035958-04	9/23/2008	1
9476	J.H.	0114035958-04	9/23/2008	
9477	Y.J.	0147773923-01	11/3/2009	
9477	Y.J.	0147773923-01	11/3/2009	
9478	B.J.	0116333501-01	12/11/2008	
9478	B.J.	0116333501-01	12/11/2008	
9479	K.K.	0156248270-03	2/9/2010	
9479	K.K.	0156248270-03	2/9/2010	
9480	M.K.	0115716797-01	10/28/2008	1
9480	M.K.	0115716797-01	10/28/2008	
9481	S.K.	4145339828-14	1/28/2008	
9481	S.K.	4145339828-14	1/28/2008	1
9482	C.K.	0181491457-01	12/28/2010	1
9482	C.K.	0181491457-01	12/28/2010	
9483	C.K.	0127569549-01	3/25/2009	1
9483	C.K.	0127569549-01	3/25/2009	
9484	E.K.	0131998725-01	5/5/2009	1
9484	E.K.	0131998725-01	5/5/2009	
9485	H.K.	0165932211-01	6/23/2010	
9485	H.K.	0165932211-01	6/23/2010	
9486	H.K.	0170751432-12	8/20/2010	
9486	H.K.	0170751432-12	8/20/2010	
9487	J.K.	0188935175-01	3/4/2011	1
9487	J.K.	0188935175-01	3/4/2011	
9488	J.K.	0117982958-01	10/17/2008	1
9488	J.K.	0117982958-01	10/17/2008	
9489	S.K.	0166546341-03	7/15/2010	

Representative sample of studies where Mun diagnosed cervical radiculopathy and lumbosacral radiculopathy

Pat. ID	Claimant Initials	Claim#	Date Of Service	Radic By Patient
9489	S.K.	0166546341-03	7/15/2010	1
9490	S.K.	0119352714-06	11/17/2008	
9490	S.K.	0119352714-06	11/17/2008	1
9491	T.K.	0136601713-05	8/5/2009	
9491	T.K.	0136601713-05	8/5/2009	
9492	U.K.	0127824027-01	3/30/2009	1
9492	U.K.	0127824027-01	3/30/2009	
9493	Y.K.	4145820454-02	4/4/2011	1
9494	C.K.	0132074055-02	5/27/2009	
9494	C.K.	0132074055-02	5/27/2009	1
9495	Y.K.	0123225542-03	1/22/2009	1
9495	Y.K.	0123225542-03	1/22/2009	
9496	A.K.	0157110636-03	2/17/2010	
9496	A.K.	0157110636-03	2/17/2010	
9497	J.L.	0184444727-01	1/28/2011	
9497	J.L.	0184444727-01	1/28/2011	1
9498	J.L.	0145369112-01	10/12/2009	
9498	J.L.	0145369112-01	10/12/2009	
9499	J.L.	0162605380-04	5/24/2010	
9499	J.L.	0162605380-04	5/24/2010	
9500	K.L.	4145674869-02	2/3/2010	
9500	K.L.	4145674869-02	2/3/2010	1
9501	S.L.	4145384535-01	3/7/2008	1
9501	S.L.	4145384535-01	3/7/2008	
9502	Y.L.	0156307209-01	1/22/2010	
9502	Y.L.	0156307209-01	1/22/2010	
9503	D.M.	4145065282-02	6/28/2007	1
9503	D.M.	4145065282-02	7/12/2007	
9504	M.P.	0178083267-01	11/2/2010	
9504	M.P.	0178083267-01	11/2/2010	
9505	H.P.	2126959465-03	3/28/2008	
9505	H.P.	2126959465-03	3/28/2008	1
9506	M.P.	0143863009-02	9/14/2009	
9506	M.P.	0143863009-02	9/14/2009	
9507	C.P.	0154524623-06	1/14/2010	
9507	C.P.	0154524623-06	1/14/2010	
9508	D.R.	0112462882-01	8/27/2008	1
9508	D.R.	0112462882-01	8/27/2008	
9509	R.S.	4145512796-02	1/15/2009	
9509	R.S.	4145512796-02	1/15/2009	1
9510	E.S.	0127955334-10	4/6/2009	
9510	E.S.	0127955334-10	4/6/2009	1

Allstate Ins. Co. v. Nara Rehab et al.**Representative sample of studies where Mun diagnosed cervical radiculopathy and lumbosacral radiculopathy**

Pat. ID	Claimant Initials	Claim#	Date Of Service	Radic By Patient
9511	K.S.	0144554847-05	10/7/2009	
9511	K.S.	0144554847-05	10/7/2009	
9512	M.S.	0173331983-04	9/3/2010	
9512	M.S.	0173331983-04	9/3/2010	1
9513	Y.Y.	4145436244-01	7/8/2008	
9513	Y.Y.	4145436244-01	7/8/2008	
9514	D.Y.	0112214069-07	9/26/2008	1
9514	D.Y.	0112214069-07	9/26/2008	

EXHIBIT K

Random sample of cervical radiculopathy studies in which Mun falsely claimed to diagnose radiculopathy

Pat. ID	Claimant Initials	Claim#	Date Of Service	Cerv Radic By Pt.	Cerv Level
9468	C.C.	0146684113-01	10/8/2009		
9468	C.C.	0146684113-01	10/8/2009		
9469	K.C.	4816805834-01	3/14/2008	1	R_C7
9469	K.C.	4816805834-01	3/14/2008		
9470	H.C.	0183619808-01	1/10/2011		
9470	H.C.	0183619808-01	1/10/2011		
9471	J.C.	0111635298-01	8/1/2008	1	L_C5
9471	J.C.	0111635298-01	8/1/2008		
9472	K.C.	0128869260-02	4/8/2009		
9472	K.C.	0128869260-02	4/8/2009		
9473	M.C.	0137926176-08	7/22/2009		
9473	M.C.	0137926176-08	7/22/2009		
9474	C.H.	0168897105-02	7/16/2010		
9474	C.H.	0168897105-02	7/16/2010		
9475	B.H.	2127070072-03	9/18/2008	1	R_C7
9475	B.H.	2127070072-03	9/18/2008		
9476	J.H.	0114035958-04	9/23/2008	1	R_C5
9476	J.H.	0114035958-04	9/23/2008		
9477	Y.J.	0147773923-01	11/3/2009		
9477	Y.J.	0147773923-01	11/3/2009		
9478	B.J.	0116333501-01	12/11/2008		
9478	B.J.	0116333501-01	12/11/2008		
9479	K.K.	0156248270-03	2/9/2010		
9479	K.K.	0156248270-03	2/9/2010		
9480	M.K.	0115716797-01	10/28/2008	1	L_C6
9480	M.K.	0115716797-01	10/28/2008		
9481	S.K.	4145339828-14	1/28/2008		
9481	S.K.	4145339828-14	1/28/2008		
9482	C.K.	0181491457-01	12/28/2010	1	R_C7
9482	C.K.	0181491457-01	12/28/2010		
9483	C.K.	0127569549-01	3/25/2009	1	R_C6
9483	C.K.	0127569549-01	3/25/2009		
9484	E.K.	0131998725-01	5/5/2009	1	R_C6
9484	E.K.	0131998725-01	5/5/2009		
9485	H.K.	0165932211-01	6/23/2010		
9485	H.K.	0165932211-01	6/23/2010		
9486	H.K.	0170751432-12	8/20/2010		
9486	H.K.	0170751432-12	8/20/2010		
9487	J.K.	0188935175-01	3/4/2011	1	L_C5
9487	J.K.	0188935175-01	3/4/2011		
9488	J.K.	0117982958-01	10/17/2008	1	R_C6
9488	J.K.	0117982958-01	10/17/2008		

Random sample of cervical radiculopathy studies in which Mun falsely claimed to diagnose radiculopathy

Pat. ID	Claimant Initials	Claim#	Date Of Service	Cerv Radic By Pt.	Cerv Level
9489	S.K.	0166546341-03	7/15/2010		
9489	S.K.	0166546341-03	7/15/2010		
9490	S.K.	0119352714-06	11/17/2008		
9490	S.K.	0119352714-06	11/17/2008		
9491	T.K.	0136601713-05	8/5/2009		
9491	T.K.	0136601713-05	8/5/2009		
9492	U.K.	0127824027-01	3/30/2009	1	R_C5
9492	U.K.	0127824027-01	3/30/2009		
9493	Y.K.	4145820454-02	4/4/2011	1	L_C6
9494	C.K.	0132074055-02	5/27/2009		
9494	C.K.	0132074055-02	5/27/2009		
9495	Y.K.	0123225542-03	1/22/2009	1	L_C5
9495	Y.K.	0123225542-03	1/22/2009		
9496	A.K.	0157110636-03	2/17/2010		
9496	A.K.	0157110636-03	2/17/2010		
9497	J.L.	0184444727-01	1/28/2011		
9497	J.L.	0184444727-01	1/28/2011		
9498	J.L.	0145369112-01	10/12/2009		
9498	J.L.	0145369112-01	10/12/2009		
9499	J.L.	0162605380-04	5/24/2010		
9499	J.L.	0162605380-04	5/24/2010		
9500	K.L.	4145674869-02	2/3/2010		
9500	K.L.	4145674869-02	2/3/2010		
9501	S.L.	4145384535-01	3/7/2008	1	L_C6
9501	S.L.	4145384535-01	3/7/2008		
9502	Y.L.	0156307209-01	1/22/2010		
9502	Y.L.	0156307209-01	1/22/2010		
9503	D.M.	4145065282-02	6/28/2007	1	L_C5
9503	D.M.	4145065282-02	7/12/2007		
9504	M.P.	0178083267-01	11/2/2010		
9504	M.P.	0178083267-01	11/2/2010		
9505	H.P.	2126959465-03	3/28/2008		
9505	H.P.	2126959465-03	3/28/2008		
9506	M.P.	0143863009-02	9/14/2009		
9506	M.P.	0143863009-02	9/14/2009		
9507	C.P.	0154524623-06	1/14/2010		
9507	C.P.	0154524623-06	1/14/2010		
9508	D.R.	0112462882-01	8/27/2008	1	L_C7
9508	D.R.	0112462882-01	8/27/2008		
9509	R.S.	4145512796-02	1/15/2009		
9509	R.S.	4145512796-02	1/15/2009		
9510	E.S.	0127955334-10	4/6/2009		

Random sample of cervical radiculopathy studies in which Mun falsely claimed to diagnose radiculopathy

Pat. ID	Claimant Initials	Claim#	Date Of Service	Cerv Radic By Pt.	Cerv Level
9510	E.S.	0127955334-10	4/6/2009		
9511	K.S.	0144554847-05	10/7/2009		
9511	K.S.	0144554847-05	10/7/2009		
9512	M.S.	0173331983-04	9/3/2010		
9512	M.S.	0173331983-04	9/3/2010		
9513	Y.Y.	4145436244-01	7/8/2008		
9513	Y.Y.	4145436244-01	7/8/2008		
9514	D.Y.	0112214069-07	9/26/2008	1	L_C5
9514	D.Y.	0112214069-07	9/26/2008		

EXHIBIT L

Random sample studies reflecting false diagnoses for lumbosacral radiculopathy

Pat. ID	Claimant Initials	Claim#	Date Of Service	Lumb Radic by Pt.	Lumb Level
9468	C.C.	0146684113-01	10/8/2009		
9468	C.C.	0146684113-01	10/8/2009	1	L_L5
9469	K.C.	4816805834-01	3/14/2008		
9469	K.C.	4816805834-01	3/14/2008		
9470	H.C.	0183619808-01	1/10/2011		
9470	H.C.	0183619808-01	1/10/2011	1	B_L5
9471	J.C.	0111635298-01	8/1/2008		
9471	J.C.	0111635298-01	8/1/2008	1	L_L4
9472	K.C.	0128869260-02	4/8/2009		
9472	K.C.	0128869260-02	4/8/2009	1	R_L5
9473	M.C.	0137926176-08	7/22/2009		
9473	M.C.	0137926176-08	7/22/2009		
9474	C.H.	0168897105-02	7/16/2010		
9474	C.H.	0168897105-02	7/16/2010		
9475	B.H.	2127070072-03	9/18/2008		
9475	B.H.	2127070072-03	9/18/2008	1	B_L4
9476	J.H.	0114035958-04	9/23/2008		
9476	J.H.	0114035958-04	9/23/2008	1	R_L5
9477	Y.J.	0147773923-01	11/3/2009		
9477	Y.J.	0147773923-01	11/3/2009		
9478	B.J.	0116333501-01	12/11/2008		
9478	B.J.	0116333501-01	12/11/2008		
9479	K.K.	0156248270-03	2/9/2010		
9479	K.K.	0156248270-03	2/9/2010		
9480	M.K.	0115716797-01	10/28/2008		
9480	M.K.	0115716797-01	10/28/2008	1	L_L5
9481	S.K.	4145339828-14	1/28/2008		
9481	S.K.	4145339828-14	1/28/2008	1	B_L5
9482	C.K.	0181491457-01	12/28/2010		
9482	C.K.	0181491457-01	12/28/2010	1	R_L3
9483	C.K.	0127569549-01	3/25/2009		
9483	C.K.	0127569549-01	3/25/2009	1	R_L5
9484	E.K.	0131998725-01	5/5/2009		
9484	E.K.	0131998725-01	5/5/2009	1	R_L5
9485	H.K.	0165932211-01	6/23/2010		
9485	H.K.	0165932211-01	6/23/2010		
9486	H.K.	0170751432-12	8/20/2010		
9486	H.K.	0170751432-12	8/20/2010		
9487	J.K.	0188935175-01	3/4/2011		
9487	J.K.	0188935175-01	3/4/2011		
9488	J.K.	0117982958-01	10/17/2008		
9488	J.K.	0117982958-01	10/17/2008	1	R_L5

Pat. ID	Claimant Initials	Claim#	Date Of Service	Lumb Radic by Pt.	Lumb Level
9489	S.K.	0166546341-03	7/15/2010		
9489	S.K.	0166546341-03	7/15/2010	1	L_L5S1
9490	S.K.	0119352714-06	11/17/2008		
9490	S.K.	0119352714-06	11/17/2008	1	L_L4
9491	T.K.	0136601713-05	8/5/2009		
9491	T.K.	0136601713-05	8/5/2009		
9492	U.K.	0127824027-01	3/30/2009		
9492	U.K.	0127824027-01	3/30/2009		
9493	Y.K.	4145820454-02	4/4/2011		
9494	C.K.	0132074055-02	5/27/2009		
9494	C.K.	0132074055-02	5/27/2009	1	R_L5
9495	Y.K.	0123225542-03	1/22/2009		
9495	Y.K.	0123225542-03	1/22/2009		
9496	A.K.	0157110636-03	2/17/2010		
9496	A.K.	0157110636-03	2/17/2010		
9497	J.L.	0184444727-01	1/28/2011		
9497	J.L.	0184444727-01	1/28/2011	1	R_L5
9498	J.L.	0145369112-01	10/12/2009		
9498	J.L.	0145369112-01	10/12/2009		
9499	J.L.	0162605380-04	5/24/2010		
9499	J.L.	0162605380-04	5/24/2010		
9500	K.L.	4145674869-02	2/3/2010		
9500	K.L.	4145674869-02	2/3/2010	1	L_L4
9501	S.L.	4145384535-01	3/7/2008		
9501	S.L.	4145384535-01	3/7/2008		
9502	Y.L.	0156307209-01	1/22/2010		
9502	Y.L.	0156307209-01	1/22/2010		
9503	D.M.	4145065282-02	6/28/2007		
9503	D.M.	4145065282-02	7/12/2007		
9504	M.P.	0178083267-01	11/2/2010		
9504	M.P.	0178083267-01	11/2/2010		
9505	H.P.	2126959465-03	3/28/2008		
9505	H.P.	2126959465-03	3/28/2008	1	L4
9506	M.P.	0143863009-02	9/14/2009		
9506	M.P.	0143863009-02	9/14/2009		
9507	C.P.	0154524623-06	1/14/2010		
9507	C.P.	0154524623-06	1/14/2010		
9508	D.R.	0112462882-01	8/27/2008		
9508	D.R.	0112462882-01	8/27/2008		
9509	R.S.	4145512796-02	1/15/2009		
9509	R.S.	4145512796-02	1/15/2009	1	B_L4
9510	E.S.	0127955334-10	4/6/2009		

Pat. ID	Claimant Initials	Claim#	Date Of Service	Lumb Radic by Pt.	Lumb Level
9510	E.S.	0127955334-10	4/6/2009	1	R_L4
9511	K.S.	0144554847-05	10/7/2009		
9511	K.S.	0144554847-05	10/7/2009		
9512	M.S.	0173331983-04	9/3/2010		
9512	M.S.	0173331983-04	9/3/2010	1	L_L5
9513	Y.Y.	4145436244-01	7/8/2008		
9513	Y.Y.	4145436244-01	7/8/2008		
9514	D.Y.	0112214069-07	9/26/2008		
9514	D.Y.	0112214069-07	9/26/2008	1	R_L5

EXHIBIT M

Allstate Ins. Co. v. Nara Rehab et al.

Random sample of studies reflecting false paraspinal findings

Pat. ID	Claimant Initials	Claim#	Date Of Service	Paras Only	Both Limb And Paras
9468	C.C.	0146684113-01	10/8/2009		
9468	C.C.	0146684113-01	10/8/2009		1
9469	K.C.	4816805834-01	3/14/2008		1
9469	K.C.	4816805834-01	3/14/2008		
9470	H.C.	0183619808-01	1/10/2011		
9470	H.C.	0183619808-01	1/10/2011	1	
9471	J.C.	0111635298-01	8/1/2008		1
9471	J.C.	0111635298-01	8/1/2008	1	
9472	K.C.	0128869260-02	4/8/2009		
9472	K.C.	0128869260-02	4/8/2009		1
9473	M.C.	0137926176-08	7/22/2009		
9473	M.C.	0137926176-08	7/22/2009		
9474	C.H.	0168897105-02	7/16/2010		
9474	C.H.	0168897105-02	7/16/2010		
9475	B.H.	2127070072-03	9/18/2008	1	
9475	B.H.	2127070072-03	9/18/2008	1	
9476	J.H.	0114035958-04	9/23/2008		1
9476	J.H.	0114035958-04	9/23/2008		1
9477	Y.J.	0147773923-01	11/3/2009		
9477	Y.J.	0147773923-01	11/3/2009		
9478	B.J.	0116333501-01	12/11/2008		
9478	B.J.	0116333501-01	12/11/2008		
9479	K.K.	0156248270-03	2/9/2010		
9479	K.K.	0156248270-03	2/9/2010		
9480	M.K.	0115716797-01	10/28/2008		1
9480	M.K.	0115716797-01	10/28/2008		1
9481	S.K.	4145339828-14	1/28/2008		
9481	S.K.	4145339828-14	1/28/2008	1	
9482	C.K.	0181491457-01	12/28/2010		1
9482	C.K.	0181491457-01	12/28/2010	1	
9483	C.K.	0127569549-01	3/25/2009		1
9483	C.K.	0127569549-01	3/25/2009		1
9484	E.K.	0131998725-01	5/5/2009		1
9484	E.K.	0131998725-01	5/5/2009		1
9485	H.K.	0165932211-01	6/23/2010		
9485	H.K.	0165932211-01	6/23/2010		
9486	H.K.	0170751432-12	8/20/2010		
9486	H.K.	0170751432-12	8/20/2010		
9487	J.K.	0188935175-01	3/4/2011		1
9487	J.K.	0188935175-01	3/4/2011		
9488	J.K.	0117982958-01	10/17/2008		1
9488	J.K.	0117982958-01	10/17/2008		1
9489	S.K.	0166546341-03	7/15/2010		

Pat. ID	Claimant Initials	Claim#	Date Of Service	Paras Only	Both Limb And Paras
9489	S.K.	0166546341-03	7/15/2010	1	
9490	S.K.	0119352714-06	11/17/2008		
9490	S.K.	0119352714-06	11/17/2008		1
9491	T.K.	0136601713-05	8/5/2009		
9491	T.K.	0136601713-05	8/5/2009		
9492	U.K.	0127824027-01	3/30/2009		1
9492	U.K.	0127824027-01	3/30/2009		
9493	Y.K.	4145820454-02	4/4/2011		1
9494	C.K.	0132074055-02	5/27/2009		
9494	C.K.	0132074055-02	5/27/2009		1
9495	Y.K.	0123225542-03	1/22/2009		1
9495	Y.K.	0123225542-03	1/22/2009		
9496	A.K.	0157110636-03	2/17/2010		
9496	A.K.	0157110636-03	2/17/2010		
9497	J.L.	0184444727-01	1/28/2011		
9497	J.L.	0184444727-01	1/28/2011	1	
9498	J.L.	0145369112-01	10/12/2009		
9498	J.L.	0145369112-01	10/12/2009		
9499	J.L.	0162605380-04	5/24/2010		
9499	J.L.	0162605380-04	5/24/2010		
9500	K.L.	4145674869-02	2/3/2010		
9500	K.L.	4145674869-02	2/3/2010	1	
9501	S.L.	4145384535-01	3/7/2008		1
9501	S.L.	4145384535-01	3/7/2008		
9502	Y.L.	0156307209-01	1/22/2010		
9502	Y.L.	0156307209-01	1/22/2010		
9503	D.M.	4145065282-02	6/28/2007		1
9503	D.M.	4145065282-02	7/12/2007		
9504	M.P.	0178083267-01	11/2/2010		
9504	M.P.	0178083267-01	11/2/2010		
9505	H.P.	2126959465-03	3/28/2008		
9505	H.P.	2126959465-03	3/28/2008	1	
9506	M.P.	0143863009-02	9/14/2009		
9506	M.P.	0143863009-02	9/14/2009		
9507	C.P.	0154524623-06	1/14/2010		
9507	C.P.	0154524623-06	1/14/2010		
9508	D.R.	0112462882-01	8/27/2008		1
9508	D.R.	0112462882-01	8/27/2008		
9509	R.S.	4145512796-02	1/15/2009		
9509	R.S.	4145512796-02	1/15/2009	1	
9510	E.S.	0127955334-10	4/6/2009		
9510	E.S.	0127955334-10	4/6/2009		1

Pat. ID	Claimant Initials	Claim#	Date Of Service	Paras Only	Both Limb And Paras
9511	K.S.	0144554847-05	10/7/2009		
9511	K.S.	0144554847-05	10/7/2009		
9512	M.S.	0173331983-04	9/3/2010		
9512	M.S.	0173331983-04	9/3/2010		1
9513	Y.Y.	4145436244-01	7/8/2008		
9513	Y.Y.	4145436244-01	7/8/2008		
9514	D.Y.	0112214069-07	9/26/2008	1	
9514	D.Y.	0112214069-07	9/26/2008		1

EXHIBIT N

Random sample studies where Mun misrepresented the diagnosis based on an invalid EMG

Pat. ID	Claimant Initials	Claim#	Date Of Service	DX Error
9468	C.C.	0146684113-01	10/8/2009	
9468	C.C.	0146684113-01	10/8/2009	
9469	K.C.	4816805834-01	3/14/2008	
9469	K.C.	4816805834-01	3/14/2008	1
9470	H.C.	0183619808-01	1/10/2011	
9470	H.C.	0183619808-01	1/10/2011	
9471	J.C.	0111635298-01	8/1/2008	
9471	J.C.	0111635298-01	8/1/2008	
9472	K.C.	0128869260-02	4/8/2009	1
9472	K.C.	0128869260-02	4/8/2009	
9473	M.C.	0137926176-08	7/22/2009	1
9473	M.C.	0137926176-08	7/22/2009	1
9474	C.H.	0168897105-02	7/16/2010	
9474	C.H.	0168897105-02	7/16/2010	1
9475	B.H.	2127070072-03	9/18/2008	
9475	B.H.	2127070072-03	9/18/2008	
9476	J.H.	0114035958-04	9/23/2008	
9476	J.H.	0114035958-04	9/23/2008	
9477	Y.J.	0147773923-01	11/3/2009	
9477	Y.J.	0147773923-01	11/3/2009	1
9478	B.J.	0116333501-01	12/11/2008	
9478	B.J.	0116333501-01	12/11/2008	1
9479	K.K.	0156248270-03	2/9/2010	
9479	K.K.	0156248270-03	2/9/2010	1
9480	M.K.	0115716797-01	10/28/2008	
9480	M.K.	0115716797-01	10/28/2008	
9481	S.K.	4145339828-14	1/28/2008	1
9481	S.K.	4145339828-14	1/28/2008	
9482	C.K.	0181491457-01	12/28/2010	
9482	C.K.	0181491457-01	12/28/2010	
9483	C.K.	0127569549-01	3/25/2009	
9483	C.K.	0127569549-01	3/25/2009	
9484	E.K.	0131998725-01	5/5/2009	
9484	E.K.	0131998725-01	5/5/2009	
9485	H.K.	0165932211-01	6/23/2010	
9485	H.K.	0165932211-01	6/23/2010	1
9486	H.K.	0170751432-12	8/20/2010	
9486	H.K.	0170751432-12	8/20/2010	
9487	J.K.	0188935175-01	3/4/2011	
9487	J.K.	0188935175-01	3/4/2011	1
9488	J.K.	0117982958-01	10/17/2008	
9488	J.K.	0117982958-01	10/17/2008	
9489	S.K.	0166546341-03	7/15/2010	

Random sample studies where Mun misrepresented the diagnosis based on an invalid EMG

Pat. ID	Claimant Initials	Claim#	Date Of Service	DX Error
9489	S.K.	0166546341-03	7/15/2010	
9490	S.K.	0119352714-06	11/17/2008	
9490	S.K.	0119352714-06	11/17/2008	
9491	T.K.	0136601713-05	8/5/2009	
9491	T.K.	0136601713-05	8/5/2009	1
9492	U.K.	0127824027-01	3/30/2009	
9492	U.K.	0127824027-01	3/30/2009	1
9493	Y.K.	4145820454-02	4/4/2011	
9494	C.K.	0132074055-02	5/27/2009	
9494	C.K.	0132074055-02	5/27/2009	
9495	Y.K.	0123225542-03	1/22/2009	
9495	Y.K.	0123225542-03	1/22/2009	1
9496	A.K.	0157110636-03	2/17/2010	
9496	A.K.	0157110636-03	2/17/2010	
9497	J.L.	0184444727-01	1/28/2011	
9497	J.L.	0184444727-01	1/28/2011	
9498	J.L.	0145369112-01	10/12/2009	1
9498	J.L.	0145369112-01	10/12/2009	1
9499	J.L.	0162605380-04	5/24/2010	
9499	J.L.	0162605380-04	5/24/2010	1
9500	K.L.	4145674869-02	2/3/2010	
9500	K.L.	4145674869-02	2/3/2010	
9501	S.L.	4145384535-01	3/7/2008	
9501	S.L.	4145384535-01	3/7/2008	1
9502	Y.L.	0156307209-01	1/22/2010	
9502	Y.L.	0156307209-01	1/22/2010	1
9503	D.M.	4145065282-02	6/28/2007	
9503	D.M.	4145065282-02	7/12/2007	1
9504	M.P.	0178083267-01	11/2/2010	1
9504	M.P.	0178083267-01	11/2/2010	1
9505	H.P.	2126959465-03	3/28/2008	1
9505	H.P.	2126959465-03	3/28/2008	1
9506	M.P.	0143863009-02	9/14/2009	
9506	M.P.	0143863009-02	9/14/2009	1
9507	C.P.	0154524623-06	1/14/2010	
9507	C.P.	0154524623-06	1/14/2010	1
9508	D.R.	0112462882-01	8/27/2008	
9508	D.R.	0112462882-01	8/27/2008	1
9509	R.S.	4145512796-02	1/15/2009	
9509	R.S.	4145512796-02	1/15/2009	
9510	E.S.	0127955334-10	4/6/2009	
9510	E.S.	0127955334-10	4/6/2009	

Random sample studies where Mun misrepresented the diagnosis based on an invalid EMG

Pat. ID	Claimant Initials	Claim#	Date Of Service	DX Error
9511	K.S.	0144554847-05	10/7/2009	
9511	K.S.	0144554847-05	10/7/2009	1
9512	M.S.	0173331983-04	9/3/2010	1
9512	M.S.	0173331983-04	9/3/2010	
9513	Y.Y.	4145436244-01	7/8/2008	1
9513	Y.Y.	4145436244-01	7/8/2008	1
9514	D.Y.	0112214069-07	9/26/2008	
9514	D.Y.	0112214069-07	9/26/2008	

EXHIBIT O

Representative sample of studies in which the medical records failed to support the diagnosis made by Mun

Pat. ID	Claimant Initials	Claim#	Date Of Service	Unsupp DX
9468	C.C.	0146684113-01	10/8/2009	1
9468	C.C.	0146684113-01	10/8/2009	1
9469	K.C.	4816805834-01	3/14/2008	1
9469	K.C.	4816805834-01	3/14/2008	1
9470	H.C.	0183619808-01	1/10/2011	1
9470	H.C.	0183619808-01	1/10/2011	1
9471	J.C.	0111635298-01	8/1/2008	1
9471	J.C.	0111635298-01	8/1/2008	1
9472	K.C.	0128869260-02	4/8/2009	1
9472	K.C.	0128869260-02	4/8/2009	1
9473	M.C.	0137926176-08	7/22/2009	1
9473	M.C.	0137926176-08	7/22/2009	1
9474	C.H.	0168897105-02	7/16/2010	
9474	C.H.	0168897105-02	7/16/2010	1
9475	B.H.	2127070072-03	9/18/2008	1
9475	B.H.	2127070072-03	9/18/2008	1
9476	J.H.	0114035958-04	9/23/2008	1
9476	J.H.	0114035958-04	9/23/2008	1
9477	Y.J.	0147773923-01	11/3/2009	
9477	Y.J.	0147773923-01	11/3/2009	1
9478	B.J.	0116333501-01	12/11/2008	
9478	B.J.	0116333501-01	12/11/2008	1
9479	K.K.	0156248270-03	2/9/2010	
9479	K.K.	0156248270-03	2/9/2010	1
9480	M.K.	0115716797-01	10/28/2008	1
9480	M.K.	0115716797-01	10/28/2008	1
9481	S.K.	4145339828-14	1/28/2008	1
9481	S.K.	4145339828-14	1/28/2008	1
9482	C.K.	0181491457-01	12/28/2010	1
9482	C.K.	0181491457-01	12/28/2010	1
9483	C.K.	0127569549-01	3/25/2009	1
9483	C.K.	0127569549-01	3/25/2009	1
9484	E.K.	0131998725-01	5/5/2009	1
9484	E.K.	0131998725-01	5/5/2009	1
9485	H.K.	0165932211-01	6/23/2010	1
9485	H.K.	0165932211-01	6/23/2010	1
9486	H.K.	0170751432-12	8/20/2010	
9486	H.K.	0170751432-12	8/20/2010	
9487	J.K.	0188935175-01	3/4/2011	1
9487	J.K.	0188935175-01	3/4/2011	1
9488	J.K.	0117982958-01	10/17/2008	1
9488	J.K.	0117982958-01	10/17/2008	1

Representative sample of studies in which the medical records failed to support the diagnosis made by Mun

Pat. ID	Claimant Initials	Claim#	Date Of Service	Unsupp DX
9489	S.K.	0166546341-03	7/15/2010	
9489	S.K.	0166546341-03	7/15/2010	1
9490	S.K.	0119352714-06	11/17/2008	
9490	S.K.	0119352714-06	11/17/2008	1
9491	T.K.	0136601713-05	8/5/2009	
9491	T.K.	0136601713-05	8/5/2009	1
9492	U.K.	0127824027-01	3/30/2009	1
9492	U.K.	0127824027-01	3/30/2009	1
9493	Y.K.	4145820454-02	4/4/2011	1
9494	C.K.	0132074055-02	5/27/2009	
9494	C.K.	0132074055-02	5/27/2009	1
9495	Y.K.	0123225542-03	1/22/2009	1
9495	Y.K.	0123225542-03	1/22/2009	1
9496	A.K.	0157110636-03	2/17/2010	
9496	A.K.	0157110636-03	2/17/2010	
9497	J.L.	0184444727-01	1/28/2011	
9497	J.L.	0184444727-01	1/28/2011	1
9498	J.L.	0145369112-01	10/12/2009	1
9498	J.L.	0145369112-01	10/12/2009	1
9499	J.L.	0162605380-04	5/24/2010	
9499	J.L.	0162605380-04	5/24/2010	1
9500	K.L.	4145674869-02	2/3/2010	
9500	K.L.	4145674869-02	2/3/2010	1
9501	S.L.	4145384535-01	3/7/2008	1
9501	S.L.	4145384535-01	3/7/2008	1
9502	Y.L.	0156307209-01	1/22/2010	
9502	Y.L.	0156307209-01	1/22/2010	1
9503	D.M.	4145065282-02	6/28/2007	1
9503	D.M.	4145065282-02	7/12/2007	1
9504	M.P.	0178083267-01	11/2/2010	1
9504	M.P.	0178083267-01	11/2/2010	1
9505	H.P.	2126959465-03	3/28/2008	1
9505	H.P.	2126959465-03	3/28/2008	1
9506	M.P.	0143863009-02	9/14/2009	
9506	M.P.	0143863009-02	9/14/2009	1
9507	C.P.	0154524623-06	1/14/2010	
9507	C.P.	0154524623-06	1/14/2010	1
9508	D.R.	0112462882-01	8/27/2008	1
9508	D.R.	0112462882-01	8/27/2008	1
9509	R.S.	4145512796-02	1/15/2009	1
9509	R.S.	4145512796-02	1/15/2009	1
9510	E.S.	0127955334-10	4/6/2009	

Representative sample of studies in which the medical records failed to support the diagnosis made by Mun

Pat. ID	Claimant Initials	Claim#	Date Of Service	Unsupp DX
9510	E.S.	0127955334-10	4/6/2009	1
9511	K.S.	0144554847-05	10/7/2009	
9511	K.S.	0144554847-05	10/7/2009	1
9512	M.S.	0173331983-04	9/3/2010	1
9512	M.S.	0173331983-04	9/3/2010	1
9513	Y.Y.	4145436244-01	7/8/2008	1
9513	Y.Y.	4145436244-01	7/8/2008	1
9514	D.Y.	0112214069-07	9/26/2008	1
9514	D.Y.	0112214069-07	9/26/2008	1

EXHIBIT P

Representative sample of studies where Mun utilized Protocol Approach to Selection of Muscles for EMG

Pat. ID	Claimant Initials	Claim#	Date Of Service	EMG Prot
9468	C.C.	0146684113-01	10/8/2009	1
9468	C.C.	0146684113-01	10/8/2009	1
9469	K.C.	4816805834-01	3/14/2008	1
9469	K.C.	4816805834-01	3/14/2008	1
9470	H.C.	0183619808-01	1/10/2011	1
9470	H.C.	0183619808-01	1/10/2011	1
9471	J.C.	0111635298-01	8/1/2008	1
9471	J.C.	0111635298-01	8/1/2008	1
9472	K.C.	0128869260-02	4/8/2009	1
9472	K.C.	0128869260-02	4/8/2009	1
9473	M.C.	0137926176-08	7/22/2009	1
9473	M.C.	0137926176-08	7/22/2009	1
9474	C.H.	0168897105-02	7/16/2010	1
9474	C.H.	0168897105-02	7/16/2010	1
9475	B.H.	2127070072-03	9/18/2008	1
9475	B.H.	2127070072-03	9/18/2008	1
9476	J.H.	0114035958-04	9/23/2008	1
9476	J.H.	0114035958-04	9/23/2008	1
9477	Y.J.	0147773923-01	11/3/2009	1
9477	Y.J.	0147773923-01	11/3/2009	1
9478	B.J.	0116333501-01	12/11/2008	1
9478	B.J.	0116333501-01	12/11/2008	1
9479	K.K.	0156248270-03	2/9/2010	1
9479	K.K.	0156248270-03	2/9/2010	1
9480	M.K.	0115716797-01	10/28/2008	1
9480	M.K.	0115716797-01	10/28/2008	1
9481	S.K.	4145339828-14	1/28/2008	
9481	S.K.	4145339828-14	1/28/2008	
9482	C.K.	0181491457-01	12/28/2010	1
9482	C.K.	0181491457-01	12/28/2010	1
9483	C.K.	0127569549-01	3/25/2009	1
9483	C.K.	0127569549-01	3/25/2009	1
9484	E.K.	0131998725-01	5/5/2009	1
9484	E.K.	0131998725-01	5/5/2009	1
9485	H.K.	0165932211-01	6/23/2010	1
9485	H.K.	0165932211-01	6/23/2010	1
9486	H.K.	0170751432-12	8/20/2010	1
9486	H.K.	0170751432-12	8/20/2010	1
9487	J.K.	0188935175-01	3/4/2011	1
9487	J.K.	0188935175-01	3/4/2011	1
9488	J.K.	0117982958-01	10/17/2008	1
9488	J.K.	0117982958-01	10/17/2008	1

Representative sample of studies where Mun utilized Protocol Approach to Selection of Muscles for EMG

Pat. ID	Claimant Initials	Claim#	Date Of Service	EMG Prot
9489	S.K.	0166546341-03	7/15/2010	1
9489	S.K.	0166546341-03	7/15/2010	1
9490	S.K.	0119352714-06	11/17/2008	1
9490	S.K.	0119352714-06	11/17/2008	1
9491	T.K.	0136601713-05	8/5/2009	1
9491	T.K.	0136601713-05	8/5/2009	1
9492	U.K.	0127824027-01	3/30/2009	1
9492	U.K.	0127824027-01	3/30/2009	1
9493	Y.K.	4145820454-02	4/4/2011	1
9494	C.K.	0132074055-02	5/27/2009	1
9494	C.K.	0132074055-02	5/27/2009	1
9495	Y.K.	0123225542-03	1/22/2009	1
9495	Y.K.	0123225542-03	1/22/2009	1
9496	A.K.	0157110636-03	2/17/2010	1
9496	A.K.	0157110636-03	2/17/2010	1
9497	J.L.	0184444727-01	1/28/2011	1
9497	J.L.	0184444727-01	1/28/2011	1
9498	J.L.	0145369112-01	10/12/2009	1
9498	J.L.	0145369112-01	10/12/2009	1
9499	J.L.	0162605380-04	5/24/2010	1
9499	J.L.	0162605380-04	5/24/2010	
9500	K.L.	4145674869-02	2/3/2010	1
9500	K.L.	4145674869-02	2/3/2010	1
9501	S.L.	4145384535-01	3/7/2008	1
9501	S.L.	4145384535-01	3/7/2008	1
9502	Y.L.	0156307209-01	1/22/2010	1
9502	Y.L.	0156307209-01	1/22/2010	1
9503	D.M.	4145065282-02	6/28/2007	
9503	D.M.	4145065282-02	7/12/2007	
9504	M.P.	0178083267-01	11/2/2010	1
9504	M.P.	0178083267-01	11/2/2010	1
9505	H.P.	2126959465-03	3/28/2008	1
9505	H.P.	2126959465-03	3/28/2008	1
9506	M.P.	0143863009-02	9/14/2009	1
9506	M.P.	0143863009-02	9/14/2009	1
9507	C.P.	0154524623-06	1/14/2010	1
9507	C.P.	0154524623-06	1/14/2010	1
9508	D.R.	0112462882-01	8/27/2008	1
9508	D.R.	0112462882-01	8/27/2008	1
9509	R.S.	4145512796-02	1/15/2009	1
9509	R.S.	4145512796-02	1/15/2009	1
9510	E.S.	0127955334-10	4/6/2009	1

Representative sample of studies where Mun utilized Protocol Approach to Selection of Muscles for EMG

Pat. ID	Claimant Initials	Claim#	Date Of Service	EMG Prot
9510	E.S.	0127955334-10	4/6/2009	1
9511	K.S.	0144554847-05	10/7/2009	1
9511	K.S.	0144554847-05	10/7/2009	1
9512	M.S.	0173331983-04	9/3/2010	1
9512	M.S.	0173331983-04	9/3/2010	1
9513	Y.Y.	4145436244-01	7/8/2008	1
9513	Y.Y.	4145436244-01	7/8/2008	1
9514	D.Y.	0112214069-07	9/26/2008	1
9514	D.Y.	0112214069-07	9/26/2008	1

EXHIBIT Q

Allstate Ins. Co. v. Nara Rehab et al.

Representative sample of studies that tested an inadequate number of limb muscles rendering the EMG medically invalid

Pat. ID	Claimant Initials	Claim#	Date Of Service	Key Musc
9468	C.C.	0146684113-01	10/8/2009	
9468	C.C.	0146684113-01	10/8/2009	1
9469	K.C.	4816805834-01	3/14/2008	1
9469	K.C.	4816805834-01	3/14/2008	
9470	H.C.	0183619808-01	1/10/2011	
9470	H.C.	0183619808-01	1/10/2011	1
9471	J.C.	0111635298-01	8/1/2008	1
9471	J.C.	0111635298-01	8/1/2008	1
9472	K.C.	0128869260-02	4/8/2009	
9472	K.C.	0128869260-02	4/8/2009	1
9473	M.C.	0137926176-08	7/22/2009	
9473	M.C.	0137926176-08	7/22/2009	
9474	C.H.	0168897105-02	7/16/2010	
9474	C.H.	0168897105-02	7/16/2010	
9475	B.H.	2127070072-03	9/18/2008	1
9475	B.H.	2127070072-03	9/18/2008	1
9476	J.H.	0114035958-04	9/23/2008	1
9476	J.H.	0114035958-04	9/23/2008	1
9477	Y.J.	0147773923-01	11/3/2009	
9477	Y.J.	0147773923-01	11/3/2009	
9478	B.J.	0116333501-01	12/11/2008	
9478	B.J.	0116333501-01	12/11/2008	
9479	K.K.	0156248270-03	2/9/2010	
9479	K.K.	0156248270-03	2/9/2010	
9480	M.K.	0115716797-01	10/28/2008	1
9480	M.K.	0115716797-01	10/28/2008	1
9481	S.K.	4145339828-14	1/28/2008	
9481	S.K.	4145339828-14	1/28/2008	1
9482	C.K.	0181491457-01	12/28/2010	1
9482	C.K.	0181491457-01	12/28/2010	1
9483	C.K.	0127569549-01	3/25/2009	1
9483	C.K.	0127569549-01	3/25/2009	1
9484	E.K.	0131998725-01	5/5/2009	1
9484	E.K.	0131998725-01	5/5/2009	1
9485	H.K.	0165932211-01	6/23/2010	
9485	H.K.	0165932211-01	6/23/2010	
9486	H.K.	0170751432-12	8/20/2010	
9486	H.K.	0170751432-12	8/20/2010	
9487	J.K.	0188935175-01	3/4/2011	1
9487	J.K.	0188935175-01	3/4/2011	
9488	J.K.	0117982958-01	10/17/2008	1
9488	J.K.	0117982958-01	10/17/2008	1
9489	S.K.	0166546341-03	7/15/2010	

Representative sample of studies that tested an inadequate number of limb muscles rendering the EMG medically invalid

Pat. ID	Claimant Initials	Claim#	Date Of Service	Key Musc
9489	S.K.	0166546341-03	7/15/2010	1
9490	S.K.	0119352714-06	11/17/2008	
9490	S.K.	0119352714-06	11/17/2008	1
9491	T.K.	0136601713-05	8/5/2009	
9491	T.K.	0136601713-05	8/5/2009	
9492	U.K.	0127824027-01	3/30/2009	1
9492	U.K.	0127824027-01	3/30/2009	
9493	Y.K.	4145820454-02	4/4/2011	1
9494	C.K.	0132074055-02	5/27/2009	
9494	C.K.	0132074055-02	5/27/2009	1
9495	Y.K.	0123225542-03	1/22/2009	1
9495	Y.K.	0123225542-03	1/22/2009	
9496	A.K.	0157110636-03	2/17/2010	
9496	A.K.	0157110636-03	2/17/2010	
9497	J.L.	0184444727-01	1/28/2011	
9497	J.L.	0184444727-01	1/28/2011	1
9498	J.L.	0145369112-01	10/12/2009	
9498	J.L.	0145369112-01	10/12/2009	
9499	J.L.	0162605380-04	5/24/2010	
9499	J.L.	0162605380-04	5/24/2010	
9500	K.L.	4145674869-02	2/3/2010	
9500	K.L.	4145674869-02	2/3/2010	1
9501	S.L.	4145384535-01	3/7/2008	1
9501	S.L.	4145384535-01	3/7/2008	
9502	Y.L.	0156307209-01	1/22/2010	
9502	Y.L.	0156307209-01	1/22/2010	
9503	D.M.	4145065282-02	6/28/2007	1
9503	D.M.	4145065282-02	7/12/2007	
9504	M.P.	0178083267-01	11/2/2010	
9504	M.P.	0178083267-01	11/2/2010	
9505	H.P.	2126959465-03	3/28/2008	
9505	H.P.	2126959465-03	3/28/2008	1
9506	M.P.	0143863009-02	9/14/2009	
9506	M.P.	0143863009-02	9/14/2009	
9507	C.P.	0154524623-06	1/14/2010	
9507	C.P.	0154524623-06	1/14/2010	
9508	D.R.	0112462882-01	8/27/2008	1
9508	D.R.	0112462882-01	8/27/2008	
9509	R.S.	4145512796-02	1/15/2009	
9509	R.S.	4145512796-02	1/15/2009	1
9510	E.S.	0127955334-10	4/6/2009	
9510	E.S.	0127955334-10	4/6/2009	1

Representative sample of studies that tested an inadequate number of limb muscles rendering the EMG medically invalid

Pat. ID	Claimant Initials	Claim#	Date Of Service	Key Musc
9511	K.S.	0144554847-05	10/7/2009	
9511	K.S.	0144554847-05	10/7/2009	
9512	M.S.	0173331983-04	9/3/2010	
9512	M.S.	0173331983-04	9/3/2010	1
9513	Y.Y.	4145436244-01	7/8/2008	
9513	Y.Y.	4145436244-01	7/8/2008	
9514	D.Y.	0112214069-07	9/26/2008	1
9514	D.Y.	0112214069-07	9/26/2008	1

EXHIBIT R

Allstate Ins. Co. v. Nara Rehab et al.

Random sample studies where Mun falsely claimed to diagnose radiculopathy based solely on a paraspinal examination

Pat. ID	Claimant Initials	Claim#	Date Of Service	DX Paras
9468	C.C.	0146684113-01	10/8/2009	
9468	C.C.	0146684113-01	10/8/2009	
9469	K.C.	4816805834-01	3/14/2008	
9469	K.C.	4816805834-01	3/14/2008	
9470	H.C.	0183619808-01	1/10/2011	
9470	H.C.	0183619808-01	1/10/2011	1
9471	J.C.	0111635298-01	8/1/2008	
9471	J.C.	0111635298-01	8/1/2008	1
9472	K.C.	0128869260-02	4/8/2009	
9472	K.C.	0128869260-02	4/8/2009	
9473	M.C.	0137926176-08	7/22/2009	
9473	M.C.	0137926176-08	7/22/2009	
9474	C.H.	0168897105-02	7/16/2010	
9474	C.H.	0168897105-02	7/16/2010	
9475	B.H.	2127070072-03	9/18/2008	1
9475	B.H.	2127070072-03	9/18/2008	1
9476	J.H.	0114035958-04	9/23/2008	
9476	J.H.	0114035958-04	9/23/2008	
9477	Y.J.	0147773923-01	11/3/2009	
9477	Y.J.	0147773923-01	11/3/2009	
9478	B.J.	0116333501-01	12/11/2008	
9478	B.J.	0116333501-01	12/11/2008	
9479	K.K.	0156248270-03	2/9/2010	
9479	K.K.	0156248270-03	2/9/2010	
9480	M.K.	0115716797-01	10/28/2008	
9480	M.K.	0115716797-01	10/28/2008	
9481	S.K.	4145339828-14	1/28/2008	
9481	S.K.	4145339828-14	1/28/2008	1
9482	C.K.	0181491457-01	12/28/2010	
9482	C.K.	0181491457-01	12/28/2010	1
9483	C.K.	0127569549-01	3/25/2009	
9483	C.K.	0127569549-01	3/25/2009	
9484	E.K.	0131998725-01	5/5/2009	
9484	E.K.	0131998725-01	5/5/2009	
9485	H.K.	0165932211-01	6/23/2010	
9485	H.K.	0165932211-01	6/23/2010	
9486	H.K.	0170751432-12	8/20/2010	
9486	H.K.	0170751432-12	8/20/2010	
9487	J.K.	0188935175-01	3/4/2011	
9487	J.K.	0188935175-01	3/4/2011	
9488	J.K.	0117982958-01	10/17/2008	
9488	J.K.	0117982958-01	10/17/2008	
9489	S.K.	0166546341-03	7/15/2010	

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Random sample studies where Mun falsely claimed to diagnose radiculopathy based solely on a paraspinal examination

Pat. ID	Claimant Initials	Claim#	Date Of Service	DX Paras
9489	S.K.	0166546341-03	7/15/2010	1
9490	S.K.	0119352714-06	11/17/2008	
9490	S.K.	0119352714-06	11/17/2008	
9491	T.K.	0136601713-05	8/5/2009	
9491	T.K.	0136601713-05	8/5/2009	
9492	U.K.	0127824027-01	3/30/2009	
9492	U.K.	0127824027-01	3/30/2009	
9493	Y.K.	4145820454-02	4/4/2011	
9494	C.K.	0132074055-02	5/27/2009	
9494	C.K.	0132074055-02	5/27/2009	
9495	Y.K.	0123225542-03	1/22/2009	
9495	Y.K.	0123225542-03	1/22/2009	
9496	A.K.	0157110636-03	2/17/2010	
9496	A.K.	0157110636-03	2/17/2010	
9497	J.L.	0184444727-01	1/28/2011	
9497	J.L.	0184444727-01	1/28/2011	1
9498	J.L.	0145369112-01	10/12/2009	
9498	J.L.	0145369112-01	10/12/2009	
9499	J.L.	0162605380-04	5/24/2010	
9499	J.L.	0162605380-04	5/24/2010	
9500	K.L.	4145674869-02	2/3/2010	
9500	K.L.	4145674869-02	2/3/2010	1
9501	S.L.	4145384535-01	3/7/2008	
9501	S.L.	4145384535-01	3/7/2008	
9502	Y.L.	0156307209-01	1/22/2010	
9502	Y.L.	0156307209-01	1/22/2010	
9503	D.M.	4145065282-02	6/28/2007	
9503	D.M.	4145065282-02	7/12/2007	
9504	M.P.	0178083267-01	11/2/2010	
9504	M.P.	0178083267-01	11/2/2010	
9505	H.P.	2126959465-03	3/28/2008	
9505	H.P.	2126959465-03	3/28/2008	1
9506	M.P.	0143863009-02	9/14/2009	
9506	M.P.	0143863009-02	9/14/2009	
9507	C.P.	0154524623-06	1/14/2010	
9507	C.P.	0154524623-06	1/14/2010	
9508	D.R.	0112462882-01	8/27/2008	
9508	D.R.	0112462882-01	8/27/2008	
9509	R.S.	4145512796-02	1/15/2009	
9509	R.S.	4145512796-02	1/15/2009	1
9510	E.S.	0127955334-10	4/6/2009	
9510	E.S.	0127955334-10	4/6/2009	

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Random sample studies where Mun falsely claimed to diagnose radiculopathy based solely on a paraspinal examination

Pat. ID	Claimant Initials	Claim#	Date Of Service	DX Paras
9511	K.S.	0144554847-05	10/7/2009	
9511	K.S.	0144554847-05	10/7/2009	
9512	M.S.	0173331983-04	9/3/2010	
9512	M.S.	0173331983-04	9/3/2010	
9513	Y.Y.	4145436244-01	7/8/2008	
9513	Y.Y.	4145436244-01	7/8/2008	
9514	D.Y.	0112214069-07	9/26/2008	1
9514	D.Y.	0112214069-07	9/26/2008	

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

ALLSTATE INSURANCE COMPANY,

Plaintiff,

-against-

DAVID MUN M.D. AND NARA REHAB MEDICAL, P.C.,

Defendants.

X

) CIVIL ACTION

) No: _____

) (TRIAL BY
JURY
DEMANDED)

X

COMPLAINT

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